

ORIGINAL TRANSCRIPT

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

* * * * *

USA, ET AL., SIMONEAUX NO.: 3:12-CV-00219

VERSUS

E.I. DU PONT DE NEMOURS
& COMPANY

* * * * *



The deposition of LONNIE BLANCHARD
Taken on Monday, the 15th day of September, 2013
Commencing at 12:55 p.m.
At the offices of
J. Arthur Smith, III
830 North Street
Baton Rouge, Louisiana 70802

REPORTED BY: ELICIA H. WOODWORTH, C.C.R.



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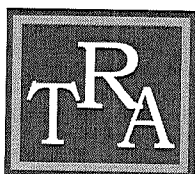
EXAMINATION

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JSA 8/1/12	



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1 APPEARANCES:

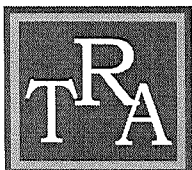
2 REPRESENTING JEFFREY M. SIMONEAUX:

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STIPULATION

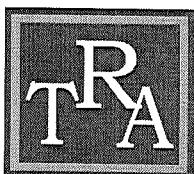
It is stipulated and agreed by and between all parties that the deposition of Lonnie Blanchard is hereby being taken under the Louisiana Code of Civil Procedure for all purposes.

The witness waived the right to read and sign the deposition. The original is to be retained by Jane H. Barney, Esquire for proper filing with the Clerk of Court.

All objections, except those as to the form of the question and the responsiveness of the answer, are hereby reserved until the time of the trial of the cause.

* * * *

Elicia H. Woodworth, Certified Court Reporter in and for the State of Louisiana, officiated in administering the oath to the witness.



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1 LONNIE BLANCHARD,
2 Having been first duly sworn, was examined and testified
3 as follows:

4 EXAMINATION BY MS. BARNEY:

5 Q. Hi, Mr. Blanchard. Thanks for coming in.

6 A. Thank you.

7 Q. You did receive a subpoena to be here today;
8 right, a piece of paper?

9 A. Yes, ma'am.

10 Q. Okay. Good.

11 Would you state your full name and address for
12 the record.

13 A. Lonnie Paul Blanchard, 109 Gary Street, Pierre
14 Part, Louisiana. 70339 is the ZIP code.

15 Q. Okay. How long have you lived there?

16 A. All of my life, 65 years.

17 Q. Wow. Okay.

18 Have you ever given a deposition before --

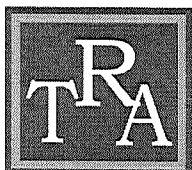
19 A. No, ma'am.

20 Q. -- where you come in for something like this?

21 A. No, ma'am.

22 Q. I'll just go over a little bit of the rules for
23 you. The first thing is that you have to tell the
24 truth, just like if you were at court.

25 A. Yes, ma'am.



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1 Q. It's testimony, but it's done outside of the
2 courtroom. And the court reporter is taking everything
3 down that we say, so she's going to take down my
4 questions and your answers and so it helps if you can
5 let me finish my question before you start your answer.

6 A. Okay.

7 Q. Sometimes that's hard because we start a
8 conversation and we start stepping on each other, but if
9 we could just try to be careful to avoid that, it helps
10 the court reporter.

11 A. All right.

12 Q. Also, if you can answer out loud by saying yes or
13 no. Sometimes people have a tendency to stay "uh-huh"
14 or kind of nod their head, and it helps the court
15 reporter if you can say yes or no --

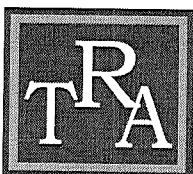
16 A. Okay.

17 Q. -- or maybe or whatever the answer is.

18 A. Okay. Yes.

19 Q. Okay. If you don't understand a question that
20 I'm asking or if it's unclear the way I've worded it,
21 just let me know and I can try to rephrase it. If you
22 answer the question, then we are going to assume you
23 understood the question, so it would help a lot if you
24 could tell me if you don't understand --

25 A. Okay.



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1 Q. -- maybe a word I used or something's not making
2 sense. Just let me know.

3 If you need a break, you can tell us, you know,
4 "I need a break," "I need to go to the restroom, get
5 some water," you know, whatever.

6 A. Okay.

7 Q. I hope we won't be here too long, but if you need
8 a break, tell us.

9 A. Whatever time it takes, I guess.

10 Q. Let's see. Did you do anything to prepare for
11 your deposition today?

12 A. No, ma'am.

13 Q. Okay. Who all have you talked with about the
14 fact that you're here giving a deposition?

15 A. The subpoena. That's all.

16 Q. Okay. And then what about people at work, you
17 had to tell them you were coming to give a deposition?

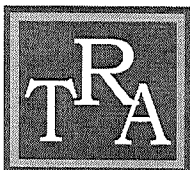
18 A. Only one I had was Robert Cayette, and he already
19 been here this morning.

20 Q. Did you have to get permission from Mark Macha or
21 anybody else at KBR?

22 A. No, ma'am.

23 Q. You're pretty much free to come and go as you
24 please at KBR?

25 A. (Indicating).



1 Q. You can come and go as you please?

2 A. Yes, ma'am.

3 Q. You don't have to ask permission to be gone?

4 A. No, ma'am.

5 Q. Okay. What is your current position in
6 employment right now?

7 A. Maintenance supervisor.

8 Q. Okay. That's with KBR?

9 A. Yes, ma'am.

10 Q. That's Kellogg, Brown & Root?

11 A. Kellogg, Brown & Root from Houston, Texas.

12 Q. How long have you been the maintenance
13 supervisor?

14 A. Twenty-four years.

15 Q. Have you always worked at DuPont in that
16 position?

17 A. Yes, ma'am.

18 Q. If you can, let's go back to your education.
19 Where did you go to high school?

20 A. Assumption High.

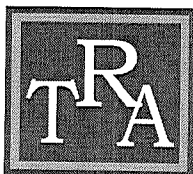
21 Q. And where is that?

22 A. Napoleonville, Assumption Parish.

23 Q. Okay. And did you graduate from there?

24 A. No, ma'am.

25 Q. When did you leave?



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1 A. Tenth grade.

2 Q. Okay. And what did you start doing when you left
3 there?

4 A. My first job was on a tug boat for Otto Candies
5 out of Raceland. I worked there for a year and then
6 went -- once I left there, I went to Avondale Shipyard
7 in Morgan City.

8 Q. Okay.

9 A. And that's where I got my craft as far as
10 pipefitting.

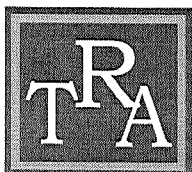
11 Q. All right.

12 A. And I worked at Avondale for, I believe, six
13 years and went -- once I got that top money, I
14 transferred to 102. It was Local 102 at the time, and I
15 worked for Payne & Keller not far from the Sunshine
16 Bridge in Convent -- yeah, I believe it's Convent,
17 Louisiana. I worked there for a couple years there and
18 transferred to Uniroyal in Geismar on maintenance, which
19 I was a pipefitter, and I worked there for six years.

20 Q. Okay.

21 A. And then once that was done, I went to work for
22 Jack White at a fabricating shop in Geismar off of
23 Highway 30, and they folded up in 1989, I believe, and I
24 transferred to DuPont in 1989, June 5th, 1989.

25 Q. Wow. Good memory.



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1 And you started at DuPont in 1989 as a...

2 A. As a supervisor, maintenance supervisor.

3 Q. Who hired you at that -- well, you were employed
4 by KBR?

5 A. Not at that time. I was employed by Jack White
6 was the -- Vince Macha was the superintendent for Jack
7 White at the time that I was working for him, and he had
8 his son as the superintendant at DuPont, which is Mark
9 Macha.

10 Q. Okay.

11 A. And me and Mark knew each other. I used to
12 fabricate the pipe when he had the contract for DuPont
13 Maintenance, but I was working at the shop at the time,
14 so that's how me and Mark got to know each other, and
15 when Jack White folded up, he recommended that I went as
16 a supervisor at DuPont Maintenance for him.

17 Q. Okay.

18 A. So that's how I got transferred over there.

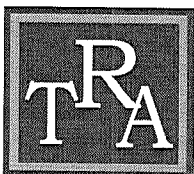
19 Q. Okay. So that was sort of a promotion?

20 A. A little bit.

21 Q. Or a move up?

22 A. Yeah, a move up yeah, and more of a steady job to
23 where I knew I could, you know, be more secure than what
24 I had before.

25 Q. When you first got to DuPont, were you working



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1 days, or were you working shift work?

2 A. No. Working days, eight hours a day, five days a
3 week.

4 Q. Okay. And is that what you're doing now?

5 A. No. We switched over to four 10s instead of five
6 8s.

7 Q. When did y'all make that switch?

8 A. About two years ago, I believe it was. I'm not
9 quite sure what date it is, but the year.

10 Q. Okay. All right. Have you been to any training
11 classes or any schools since you left high school and
12 started working, any outside kind of formal education?

13 A. I've been for classes for KBR, supervision
14 classes.

15 Q. Okay.

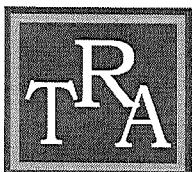
16 A. And I can't think of nothing else, but it's all
17 involved in our job scope as far as -- we go to
18 training, like TWIC card and all of that stuff.

19 Q. What was the last part, training and what?

20 A. It's training for that purpose, for like
21 security.

22 Q. Like homeland security kind of stuff?

23 A. Yes, ma'am. That's at KBR. We go to --
24 actually, we go to LaPlace, DuPont Laplace. They're our
25 main office for the Burnside plant.



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1 Q. Okay. Who at KBR kind of runs the office in
2 LaPlace; do you know?

3 A. That works in the office at LaPlace?

4 Q. Whoever is sort of the boss for KBR in LaPlace;
5 do you know?

6 A. Bruce Cobb is the only one at that time that's
7 the superintendant.

8 Q. Bruce?

9 A. Bruce Cobb, C-O-B-B.

10 Q. All right. So you would go there for training
11 that has to do with the security and the other things
12 you were talking about?

13 A. Correct.

14 Q. Okay. What about management classes, like
15 employment, treatment of employees and things like that;
16 did that cover that sort of training?

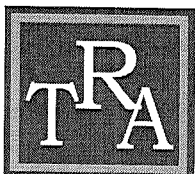
17 A. That's part -- well, we call it management
18 training.

19 Q. That was supervision-type classes?

20 A. Correct.

21 Q. Have you had training on chemicals, you know,
22 like the different types of chemicals that are at the
23 DuPont plant?

24 A. We had some with what we work with, and -- but
25 most of all, they tell us we've got MSDH mostly. If we



1 want to get more information, we can go read it at any
2 time. It's in the control room.

3 Q. Okay.

4 A. And we've got a class on all of the chemicals
5 that we deal with on site, like diesel, gasoline, fuels,
6 sulfur, stuff like that.

7 Q. Okay. And where are those classes? They're in
8 LaPlace or somewhere else?

9 A. Yes, ma'am.

10 Q. Okay.

11 A. And we have some at Burnside also in the
12 conference room that we take care of. The safety man
13 gives us all of the information we need to have.

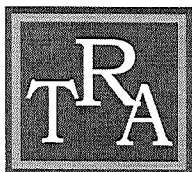
14 Q. Okay. Do you basically attend the same training
15 programs that a DuPont employee attends, or are they
16 separate?

17 A. Yes, ma'am. The operators and KBR people get
18 together sometime and have the same training.

19 Q. Okay. So I guess you had training on TSCA? Have
20 you heard the term TSCA, like the toxic substances?

21 A. Yes, ma'am. That's the HAZWOPER training, that's
22 what part of it disclosed of, the chemicals that we deal
23 with. Toxic chemicals like sulfur, like SO2 fumes and
24 stuff like that.

25 Q. Okay. And you've had training on Oleum, I guess,



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1 that's out at the plant?

2 A. Not too much Oleum. I didn't have too -- I know
3 we have it on site, but that's different than what we
4 deal with. That's more to the -- that part, DuPont
5 maintenance takes care of that part on the Oleum part.
6 I think that's what they call the hot house, and we
7 don't deal with that.

8 Q. What about SO3?

9 A. We do deal with that. SO3, that's gas leaks that
10 we do have at the plant coming up -- what do you call
11 it? A converter. That's where we convert from, I guess
12 what you call, molten sulfur to acid at that point.
13 That's where we have leaks at.

14 Q. Okay. And you understand, I guess, that the
15 deposition has to do with leaks at DuPont, or did you
16 know that?

17 A. Risks?

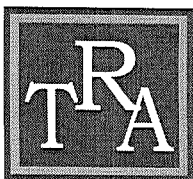
18 Q. Leaks at DuPont. The reason we're doing this
19 deposition has to do with the leaks.

20 A. Yes, ma'am, I understand.

21 Q. Okay. And so you're not the first witness, I
22 guess you understand, that we've talked to?

23 A. Right.

24 Q. Okay. In your training with SO3, they told you
25 that was a hazardous chemical?



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1 A. Yes, ma'am.

2 Q. And it's toxic and that sort of thing?

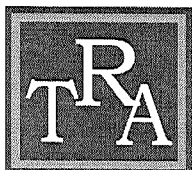
3 A. Have to wear face masks and whatever to deal with
4 it. The lowest PPE we have is Tyvek suits that we wear
5 and face masks is what we deal with when we on the
6 vessel itself, employees, trying to capture the leaks to
7 repair the system or whatever that we have to put it
8 back in the unit, not to let it go off site, and that's
9 what we deal with.

10 Q. Okay. Do you have any environmental training,
11 like complying with regulatory authorities or --

12 A. No. I don't -- I don't -- I'm not that high in
13 management. What they ask me is, "How far do you think
14 the gas went off site?" Sometimes I'll have to go ride
15 with a truck, like seeing how far the gas is going out,
16 but that's the only machine or material thing I have is
17 to go myself and check it out and see how bad it is.
18 And especially like on the weekends when I got called
19 out for a gas leak, then I got to report on the Monday
20 how far it was or how bad it was and all of that kind of
21 information that they asked me.

22 Q. And who asks you for that information? Is that
23 Liz Cromwell or --

24 A. The plant manager asked me a couple of times
25 while I was called out, how far it was, how bad it was



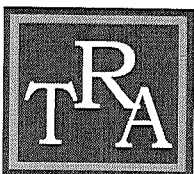
1 and I told him. They called me because it was shutting
2 down the 5 and 6 tank car loading rack at the time,
3 because normally when they call me out, I got to call
4 other people out to get it fixed, and by the time I get
5 there, I got to get the report on how bad it was and
6 what it was and identify what we did to fix it and stuff
7 like this.

8 Q. Okay. Who calls you out?

9 A. Most of the time the operators call my
10 superintendent out, which is Mark Macha. They got to
11 call him first and then he calls me and then he tells me
12 who he's going to call out to be there when I get there
13 to help solve the problem, whatever problem we have, and
14 most of time, he tells me what the situation is before I
15 leave my house.

16 Q. Okay. So when you go to drive to see how far the
17 leak has gone, you're looking -- it's a visible leak;
18 it's something you can see?

19 A. Yeah, at times. Sometimes you can see,
20 sometimes -- it all depends how bad it is. I can see
21 it. I don't know if anybody else can see it because
22 it's like a light blue color, and if you're not used to
23 it -- what I'm saying is that you can look at the plant
24 and not see. It's just a light blue color, and if I'm
25 in the plant, I'll trace it down and see how far it's



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1 going and when it's coming down.

2 Q. Okay. So the way it behaves in the air is
3 something you're kind of familiar with?

4 A. Yeah. Sometimes the wind direction got something
5 to do with that. If it's going in a northwest wind,
6 it's going into the wooded area. Southeast wind, it's
7 going towards Highway 44, the levee part, and that's the
8 most concern that they have is to make sure it don't --
9 catch the shortest part by going off site is Highway 44.

10 Q. And which direction -- oh, okay. So southeast
11 would be the shortest route to being off site?

12 A. Southeast wind would be the shortest route for it
13 to go on the highway. Offsite is what I'm saying,
14 that's where we got to be more concerned about getting
15 there and getting it repaired.

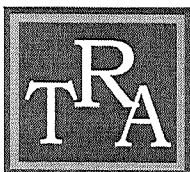
16 Q. Why is it so important, this off site
17 designation?

18 A. Because it's a toxic chemical. It's SO3 gas.

19 Q. Okay. So you're sort of trying to police the
20 boundaries, I guess, of the site?

21 A. Right. Well, they make that. My job is to go up
22 in there and get it caught, get it -- whatever we've got
23 to do to keep it off site -- I mean on site and fix and
24 repair the leak.

25 Q. All right. So are you the only one who's told to



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1 go down the road and see how far it's gone or are there
2 other people who are asked to do that, too, or do you
3 know?

4 A. Most of the time me and Mark will look at the
5 situation most of the time and decide where we're going
6 to go from there, and then I get all of my stuff ready,
7 then get my guys suited up, whatever we need to do to
8 collect the gas. What we're doing right now is using
9 suction hoses that goes back into the unit, goes back
10 into the system, and we're using suction hoses to
11 collect the gas and put it back into the system where it
12 won't go off site.

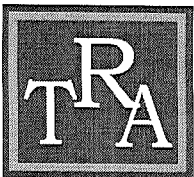
13 Q. Okay. Does Mark Macha know as much as you know
14 about what the gas looks like in the air?

15 A. Yeah, both about the same thing. We both have
16 been long enough to where we can actually see the gas
17 and we can know exactly where it's coming out from.

18 Q. When the gas mixes with humidity in the air, does
19 it have a tendency to fall out and go down?

20 A. The more humidity that's in the air, the better
21 to stay on site. What I'm saying, if it's a dry air
22 day, it goes up further and you got to work a little bit
23 harder and a little bit faster to catch it to contain
24 it.

25 Q. Okay. What's the farthest would you say you've



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1 had to drive and spot this gas cloud? How far down the
2 highway? What's the farthest drive you've ever had to
3 make and you could still see the gas cloud?

4 A. Time-wise you're talking about?

5 Q. Time or distance, whatever you remember.

6 A. As far as an hour, as far as how long as it takes
7 to get the hose and the leak?

8 Q. Oh, I'm sorry. What I mean is, when you're
9 driving down the highway to see how far the gas cloud is
10 going --

11 A. Oh, how wide it is, you mean?

12 Q. Yeah. The distance away from DuPont.

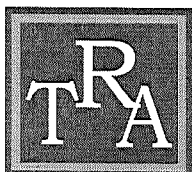
13 A. Oh, okay. I don't -- I don't go on the road. I
14 go up in the unit on the plant site. I don't go off
15 site to check that.

16 Q. Okay. So when you're riding around in the truck
17 to see where it's going --

18 A. I go up to the fence area and stop and look and
19 see how far it's going, if it's over the road, down on
20 the levee, and then I report that to the control room.

21 Q. Oh, okay. All right. So when you're sitting at
22 the fence line, it could be going any -- southeast or
23 north --

24 A. Sometimes it's going over 44, the highway, and
25 onto the levee and into the river, but it's not going



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1 not that much further.

2 Q. Okay.

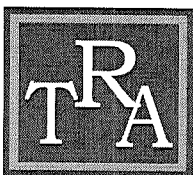
3 A. That's the worst one I ever had that I know I can
4 come back and really look at it in my head and see what
5 I'm talking about.

6 Q. The one you were talking about going towards the
7 river?

8 A. About six, seven months ago when they had a
9 collapsed hose on the front pass of the converter, which
10 is a really bad leak, and they cannot fix it right now
11 because they have to go inside of the vessel to get it
12 fixed and you got to wait for the shutdown and a
13 scheduled shutdown to fix that. So my job is to contain
14 that gas and put it back into the unit until they can go
15 down and fix it from the inside.

16 Q. Okay. All right. Now, to try to contain it,
17 y'all are using the black corrugated hoses?

18 A. It's a mixture of two different kind of hoses.
19 Because of the heat purpose, I just can't put that black
20 hose on the actual gas leak because it's too hot. It
21 will melt it, and that's what happened, so I go in there
22 with a stainless steel metal box, make a box, make a
23 nozzle to it and connect a six-inch stainless steel
24 metal hose to that, about like 24 feet, and drill holes
25 in it to where the suction can collect cool air with the



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1 gas and then go into the black hose for another 40 feet
2 to the area where it needs to be put back into the unit.
3 So that keeps the hose from melting at that time, but
4 with the weather, it changes, with the rain and all of
5 that, it changes, and the hose collapses like this, so
6 then they got to call me out to go change the black hose
7 and get it fixed. And that's when the gas was going off
8 site at that particular time.

9 Q. Okay. So by putting a stretch of stainless steel
10 pipe coming off of the vessel that's leaking, you were
11 able to keep the heat away from the black hose --

12 A. From the plastic hose.

13 Q. -- a little bit better?

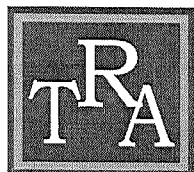
14 A. Correct, so it don't melt. That plastic hose is
15 just made for so much degrees, I guess, and it's more
16 flexible than anything else.

17 Q. Okay. So the flexibility is a good thing, I
18 would imagine?

19 A. Correct.

20 Q. Except that the type of hose that's flexible is
21 not the type that --

22 A. It's not the type of hose they should be using.
23 PVC pipe, we're using that now to make it last longer
24 and more vulnerable as far as the heat-wise is
25 concerned.



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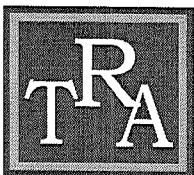
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1 Q. When did y'all start using the stainless steel
2 stretch of pipe?

3 A. It would be quite a while, like a year, maybe
4 last year, about. When the hose really got bad, they
5 started using metal hose. We told them we was using
6 black hose, but it wasn't working, it was just melting,
7 so they decided to order the metal hose, I would say,
8 about last year. At one time, we was using a metal box,
9 used to be big, metal boxes, and putting the holes on
10 it, but putting the holes like away from the box so it
11 could take fresh air also and the gas. We'd have to
12 kind of manage that where we couldn't do both things at
13 one time, so it's kind of hard to do, but we got it
14 where we want it to be.

15 Q. Okay. So for some period of time before you
16 switched to the stainless pipe, there was a metal box
17 and there was just a gap of regular air and then you had
18 a black hose with a suction?

19 A. Yeah. We had like a nozzle made onto the box
20 into that and then put the hose, and if it gets too hot,
21 what we do is drill holes in the plastic hose or put it
22 back away from the nozzle where it would make like a
23 little gap all around the nozzle, about a half-inch gap
24 where it can suck in fresh air, but we stopped that
25 because of the fact where the box was sitting at, it was



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1 on a hot surface, so we decided to just put the hose on
2 the box and drill extra holes in the black hose for it
3 to collect cool air away from the heat of the converter.

4 Q. Okay. So by putting the holes in the black hose,
5 it allowed some fresh air to come in and mix --

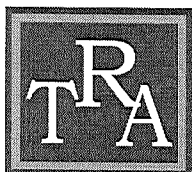
6 A. Fresh air to mix with the gas, correct, and cool
7 off the hose.

8 Q. Okay. Back before you switched to the stainless
9 steel section of the pipe system, how long would a black
10 hose go without melting? Like 48 hours or --

11 A. Longer than that. I'd say about a week, but the
12 problem with that is that once it developed a leak, it's
13 not going to get fixed until you shut it down and fix
14 it. So what happened when the gas started coming out
15 the hole, the hole gets bigger and bigger and bigger to
16 where you cannot collect the gas with the hose anymore.
17 So we decided when I see that happening, I let Mark
18 know, then he goes to the front office, and that's where
19 they shut down so we can go repair the leak. Like a
20 welding job is what I'm talking about.

21 Q. Okay. Right there when you were talking about
22 the hole gets bigger and bigger, is that a hole in the
23 corrugated black pipe, or is that a hole in the
24 equipment?

25 A. A hole in the vessel.



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1 Q. The vessel itself?

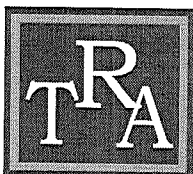
2 A. It's in the vessel itself; correct, where we're
3 picking up the gas from.

4 Q. Okay. So they've had these leaks in the vessels
5 for about two years; is that right?

6 A. Oh, yeah, definitely.

7 Q. So sometimes there have been leaks that y'all
8 were able to weld and stop or were they just kind of
9 stopped for a little while or what's the deal with that?

10 A. Well, if you have a vessel in that condition;
11 okay, welding a hole here at this time, which is about
12 maybe a foot wide, five feet away from here, all this is
13 weakened (indicating). So if you weld this up, the next
14 thing you know, it will go to the next weakest spot, so
15 next thing you know, you've got another leak three feet
16 away from there, and then you got to start taking care
17 of that one. And it's called a transition piece coming
18 off the converter, which I experienced that already in a
19 shutdown. I went inside myself and inspected what --
20 it's a castable inside the converter that normally
21 breaks down, and what that causes is a hot spot in the
22 metal. So if you look at that at night under the
23 insulation, it's cherry red, so what that's doing is
24 flaking, the metal is coming down, and next thing you
25 know, you've got a hole, but the hole is not -- it's not



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1 like when you're drilling into a piece of plate. It's
2 spread out in a long span, flaking, and when it gets to
3 the weakened point, that's your weakest part, so if you
4 just did that area, sooner or later, on either side,
5 you're going to have another leak.

6 Q. So it sounds like you're describing a thinning of
7 the metal, a thinning of the container?

8 A. Thinning wall of the transition piece is what I'm
9 saying. It's just flaking away, and you get a leak
10 here, a leak there and another leak, another leak and
11 that's what's happening.

12 Q. And the vessel is under heat and pressure, I
13 guess?

14 A. Correct. Not too much pressure, but a lot of
15 heat for sure.

16 Q. Okay. So when you fix one spot, it sort of like
17 pops up --

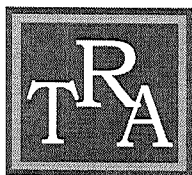
18 A. It goes to the weakest point.

19 Q. The other weakest point, the next weakest point?

20 A. Yeah. Right.

21 Q. Okay.

22 A. So once you fix that vessel, then it goes to the
23 next vessel. If that's weaker than this one, that's
24 where it's going to go at. So we've got leaks on the
25 converter boiler, which is before the converter, and



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1 then you've got four passes on the converter, first
2 pass, second pass, third pass and fourth pass. Okay?

3 Q. Okay.

4 A. And we're experiencing a leak on the first pass
5 right now, one on the second pass and a bad leak on the
6 fourth pass and one small leak on the third pass, so
7 they're planning on fixing all of this in the October
8 shutdown.

9 Q. Okay.

10 A. Which is coming up in two weeks from now.

11 Q. Okay. Over the last couple of years, when these
12 leaks have been going on, they talked about doing a cold
13 shutdown before?

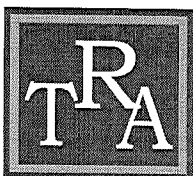
14 A. Right.

15 Q. Do you know why they never did it before?

16 A. We did went ahead and went and shutdown and fixed
17 inside the fourth pass one time that I know of.

18 Q. Okay.

19 A. But it came back. I guess it wasn't fixed right
20 or didn't get inspected or whatever, and about a year
21 after they came back up, we had the same problem again,
22 so -- and it's kind of complicated because the two
23 transition pieces comes together and they fit on top of
24 each other and they've got about a two-inch gap between
25 the both of them and that's where the leak is at. So it



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1 can't get fixed from the outside, the welder can't get
2 to it, so they have to shut down the unit completely for
3 three weeks, I believe, for it to cool down before
4 anybody can go inside, and that's how long it takes, so
5 they've got to wait until October for them to go inside.
6 And they did that job already a couple years ago, so
7 we're right back where we started on the forth pass of
8 the converter.

9 Q. So they did a cold shutdown a few years ago?

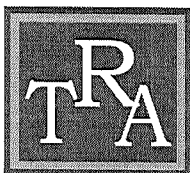
10 A. Yes, ma'am, correct. It's every two years they
11 do that.

12 Q. Okay. So this is sort of a standard shutdown;
13 they're not doing it because of the leaks, or are they
14 doing it because of the leaks?

15 A. They're not shutting down for that long because
16 of just that part. There's -- they continuously run the
17 plant in that form until they got the shutdown
18 scheduled, and several things happen. They open up all
19 of the vessels, do inspections and stuff like this, but
20 most of the times, that part, like this year, they want
21 to take out the transition piece all of the way to the
22 expansion joint and replace that with a new one.

23 Q. Okay. They're replacing what?

24 A. The transition piece off the converter and the
25 expansion joint of the first pass.



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1 Q. Okay. Do you know any other pieces of equipment
2 they're changing out or planning to change out?

3 A. As far as the gas leak is concerned?

4 Q. Yes.

5 A. The only thing I know of that we're repairing the
6 converter from the inside, just I like told you. As far
7 as -- and then the first pass, that's all I know of. As
8 far as the gas leaks on the CIP and the HIP area, they
9 got to go inside and reweld that also from the inside.
10 He can't do nothing with the outside. We catching the
11 gas at as many holes as we can, but we're not catching
12 all of it because that leak is getting too bad, so we've
13 got to wait for this shutdown for that to happen.

14 Q. Okay. Do you know if they're planning on doing
15 any work to the superheater?

16 A. The superheater? What's...

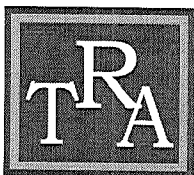
17 Q. Am I using the wrong term?

18 I believe Percy Bell testified that there were
19 leaks coming from the superheater; does that not ring a
20 bell, like a small leak in the superheater that he said
21 is not as bad as the HIP and CIP? You're not familiar
22 with the term superheater?

23 A. No, not familiar with that.

24 Q. So y'all haven't done any repairs --

25 A. No.



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1 Q. -- that you know of on the superheater?

2 A. No, ma'am.

3 Q. Okay. All right.

4 A. Oh, I know what area you're talking about now,
5 superheater. They got a bad leak on it, but that's from
6 the inside, also.

7 Q. Okay.

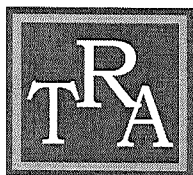
8 A. We're not doing that type of work. That's
9 contractors that's going to go inside and repair that.
10 We've got two hoses on the superheater now that we put
11 in that's been collecting the gas. I don't know how
12 long, we're not -- that's a small item --

13 Q. Okay.

14 A. -- that we'll worry about.

15 Q. Do you-all do the maintenance on the hoses
16 attached to the superheater, too?

17 A. We normally check them out. We've got a
18 schedule. Every Monday and every Thursday we check all
19 of the leaks that we have, and I got a list of them that
20 I have in my work area that we check the converter
21 boiler, superheater, first pass, second pass, third
22 pass, fourth pass and the HIP and the CIP. All
23 together, I think we've got like 24 leaks, something
24 like that. Some of them are real small, but some of
25 them are major.



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1 Q. Okay. Out of the major ones, what is the average
2 size, would you say?

3 A. The fourth pass right now is one from the inside
4 that we cannot control. We just got to work with it on
5 the outside with sheet metal, hoses, stuff like that.

6 Q. So you don't know how big it is because it's on
7 the inside?

8 A. Correct.

9 Q. Of the ones that you can see, what's the biggest
10 one you've seen?

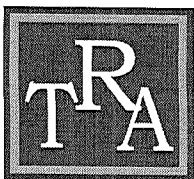
11 A. Right now, they CIP area, the bottom of the CIP
12 that's bad, and that's from the inside, also.

13 Q. Okay. So it's got sort of an area that's just
14 thin, and when you patch it, it pops up --

15 A. They're not far from each other. They're not
16 more than 50 feet away from each other. From the way
17 the wind's blowing from the southeast, it's pushing the
18 gas all in one area and then going to Highway 44 and the
19 levee.

20 Q. Okay. All right. Is there any camera aimed at
21 this area we're talking about where the leaks are?

22 A. They've got a camera on the stack. Two cameras
23 that's real high, like, I would say, about 60 foot that
24 almost you could see every part of the plant, and I
25 normally go in the control room and look at the camera



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1 to see my guys working up there just to check so I don't
2 have to walk 60 foot on the scaffold, so I normally go
3 in the control room and look on the camera and spot
4 where they're working at. First pass, you can see good,
5 fourth pass and the second pass, because it's on all on
6 the west side of the converter.

7 Q. Okay.

8 A. So where the stack is at, the stack is on the
9 west side of the converter, which I can see all of that
10 side with the camera.

11 Q. All right. Do you know if DuPont ever uses that
12 film to kind of plan things or try to calculate the gas
13 or anything like that?

14 A. No. No. We just go over and do whatever and
15 collect the gas. There's no way of measuring it or
16 anything like that.

17 Q. Okay. So nobody has talked to you about trying
18 to measure it?

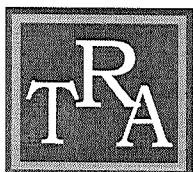
19 A. No, ma'am.

20 Q. Okay. What is the longest stretch of hose would
21 you say you have out there if you count the stainless
22 steel part and the black part?

23 A. I would say -- the black hose or the metal hose?

24 Q. You can give me both.

25 A. Both of them together?



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1 Q. Break them down for me.

2 A. I know one hose we've got like 24 feet of metal
3 hose and about 50, 60 feet of black hose. That's the
4 longest one we have.

5 Q. Okay. And what is that attached to?

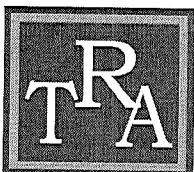
6 A. That is attached to the suction line from the
7 main blower to the dry tower where it's a 12 inch PVC
8 vacuum line that they have ran from the hot house, in
9 case they have an Oleum leak, that goes to the dry house
10 back to the unit, and we drilled holes in that line
11 right there and put six-inch PVC line to give us access
12 to a manifold that I built myself. We've got four
13 outlets to one manifold that we can run four -- all that
14 is is to shorten up the black hose from going way over
15 there to this manifold, and I go from there to the
16 actual gas leak on the converter, which is like 20, 30
17 feet.

18 Q. Okay. All right. What would you say the
19 shortest length of hose --

20 A. The shortest length of hose is -- right now, I
21 want to say, 15 feet is the shortest one.

22 Q. Where is that one located?

23 A. That's on the third pass of the converter, which
24 I've got the manifold right there on the converter
25 platform, we call that. All that does is goes up and



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1 goes down again to walk to catch one gas leak that we
2 have there. That's it. Everything else is like 25,
3 30-something feet black hose.

4 Q. All right. How often, now that you're using the
5 stainless steel sections of hose -- now that you're
6 using the stainless section of hose, how long now,
7 about, is the black hose lasting before it melts?

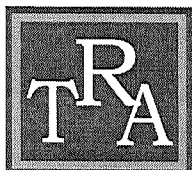
8 A. Right now, the black hose is outlasting the metal
9 hose.

10 Q. Oh, okay.

11 A. Because if you think about it, it's sucking up
12 the gas, we've got holes in the metal hose; okay, which
13 once that gas cools off, it turns into sulphate. Okay?
14 And what it does, we've got the flexible stainless steel
15 hose. It's got to be flexible for us to run it where we
16 want it to be at. What that causes is that sulfur to go
17 inside them little grooves, and the next thing you know,
18 it's all eaten out and then your gas starts coming out
19 the box to where we've got to go and cut new holes and
20 change it out.

21 Q. So basically whatever section of pipe is closest
22 to the hot vessel is the one that's going to fail first?

23 A. Is the one that fails; correct, and you can tell,
24 sometimes when you walk out, if you start seeing green,
25 that means it's started to eat out, so that's when we



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1 normally change it out because sulfate is -- especially
2 if you got a dip in it, the liquid -- and then the
3 suction to pick up the liquid, once the humic acid
4 changes to the liquid is what I'm saying, so it sits in
5 the holes and let's you know that you got -- it starts
6 eating out the metal hose. It lasts four or five days,
7 but at that point, every week, we've got to change the
8 hose out.

9 Q. Okay. And so is that -- I guess that's sort of a
10 rotating process where like one day you do one section,
11 and the next day you do another, or --

12 A. Every Monday, when we get in to work, we put all
13 four guys on leak inspection and we go check everything
14 out. If it looks bad, if it looks like it's not going
15 to make the week, well, we change it out.

16 Q. Okay.

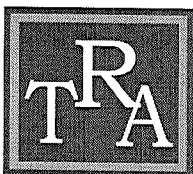
17 A. On Thursday, before we leave for the weekend, we
18 do the same thing with Thursday. It's like Monday and
19 Thursday. That's our schedule.

20 Q. Okay. When did that process start, that
21 Monday/Thursday deal?

22 A. Over a year ago.

23 Q. Okay.

24 A. Because that's when we changed -- I forget his
25 name, engineering department. He recommended that we do



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1 a schedule.

2 Q. Okay.

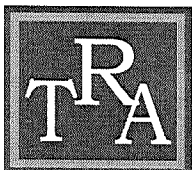
3 A. Every since then, we've been having that
4 schedule, but he left DuPont. He got transferred
5 somewhere else, and we still got that format of checking
6 the hose Monday and Thursday because they all think
7 that's a good idea because of the leaks that we've been
8 having.

9 Q. So for the year or so before that, when the leaks
10 were there, it was a little less organized, I guess,
11 or --

12 A. At that time --

13 Q. You didn't have that schedule --

14 A. When I first got there, this was 24 years ago,
15 and what we did at that time, we built a metal box at
16 the old converter. We had the same problem that we've
17 got now. It's been a metal box to collect the gas over
18 that, and we did that, but it wasn't as bad as what it
19 is now. I don't know if the metal or the people who
20 done it in the past or whatever, but they got rid of the
21 old converter and went to the new converter, but I'm
22 experiencing more problems with this converter than I
23 did on the old one. And I made that suggestion to Gene
24 Clemens, the one we can't get to that's on top of each
25 other, to get a flat board or something and weld them



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1 together to where if the leak would happen again, it
2 wouldn't go outside of the transition piece. Which one
3 it is, I don't know, but you have to go inside to fix it
4 anyway, so I recommended that we close in that two
5 transition piece with metal so it keeps the gas inside.

6 Q. Okay.

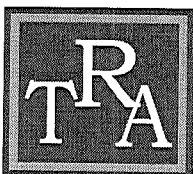
7 A. And he said he was going to look into it and see
8 what we could do about that.

9 Q. Okay. Because right now, there's nothing around
10 that leak?

11 A. Nothing. The gas -- we're collecting gas with a
12 box with the holes on top and another at the bottom.
13 There's two metal hoses at the bottom and the top on
14 both sides on the fourth pass.

15 Q. Okay. But it's not able to catch everything
16 that's coming between them?

17 A. Well, what's happens, also, like I told you, once
18 the gas goes into that metal hose -- and this is a --
19 we've got a regular six-inch metal hose on that leak.
20 Not the flexible hose, but eight feet long, then we go
21 from there to PVC pipe, but what's happening, the PVC
22 pipe is like in a bent shape and it's getting sulfate in
23 it, so when that occurs, it cuts down your suction from
24 collecting what you had on brand new. So what we're
25 doing now, we've got to cut this section off, make a new



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1 piece and switch it around and put the new piece on it.
2 And that lasts for about two or three weeks. That's
3 what we're working on right now. That just started a
4 month ago, I would say, on the fourth pass. And they're
5 try to keep the gas taken care of until the next two
6 weeks to where they can shut it down and fix it. Part
7 of that, that's my job, is take care of the leaks so
8 they don't go off site, and that's what we're working
9 on.

10 Q. That's been a big part of your job for the last
11 two years, or has it gotten to be more and more of your
12 job over the last two years?

13 A. The last year it got to be more of my job as far
14 as leak-wise is concerned.

15 Q. It's just taking more of your time?

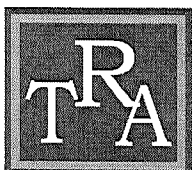
16 A. That's it. That's about all I do right now.
17 Little bitty jobs that comes up, I can take care of some
18 of them, but most of the jobs, they're giving to the
19 DuPont maintenance guys to do.

20 Q. The non-leak jobs?

21 A. Right, to where I'm taking care of gas leaks
22 right now.

23 Q. Okay. How many people do you have working for
24 you that are helping take care of the leaks?

25 A. I have regularly four of my guys at all times,



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1 but I've got helpers that I can bring in whenever they
2 have like extra stuff, like cleaning up the boilers that
3 we do on a regular schedule, I normally put those two
4 guys on to help my guys out.

5 Q. And are those full-time guys?

6 A. Yes, ma'am. They're maintenance people.

7 Q. This effort to try to contain the leaks, it
8 relies a little bit on the -- or you tell me how much it
9 relies on the suction.

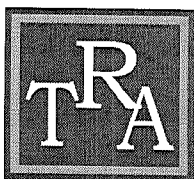
10 A. Yes, ma'am.

11 Q. Okay. So the vacuum is a big part of the
12 process?

13 A. The vacuum plays the most important part. If I
14 don't have a vacuum, I can't catch the gas leaks, and
15 what's happening is, is that we're running what we call
16 a common line. Okay? It goes all of the way to the
17 manifold. From that hose, we go there, we've got a leak
18 here, so we put a T in it and we catch that gas leak and
19 we keep on going with that same line to the next gas
20 leak, but if you understand, the more Ts you put in that
21 line, the less suction you're going to have on the very
22 end. So sometimes that gas leak on that end is worse
23 than the one up front.

24 Q. Because it's not getting as much suction --

25 A. It's not catching the gas. So what we trying to



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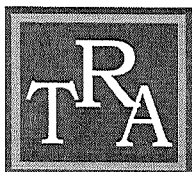
1 do now is trying to get another common line involved,
2 and some of them gas leaks are so bad, so there ain't
3 but one common line with no Ts in it to collect the gas.
4 And that's up in the CIP area. The CIP area has got
5 three comon lines going to the CIP area to collect all
6 of that gas, and rest of it is like one common line with
7 four Ts, five Ts, to collect most of the small gas leaks
8 that we have.

9 Q. How long have you had the common lines with the
10 Ts coming off of them? Has that been the way it's been
11 the whole time?

12 A. Yes, ma'am. That's been before we started.

13 Q. But you've had to add the Ts as more leaks have
14 developed or --

15 A. Well, what the problem with that was, we were
16 making our own Ts with sheet metal, stainless steel, and
17 they were collapsing. They wasn't lasting long because
18 of the friction or whatever, so they decided to buy some
19 PVC Ts to put and they would last longer, and it does.
20 On the line that we couldn't run from one place to
21 another, it was too long, we had to put the two lines
22 together, and we're putting the insert on the inside for
23 a while and tipping it up. Well, we discovered that the
24 tape from the insulation, the sheet metal, was stuffing
25 our line up at the valve, the block hole valve, and



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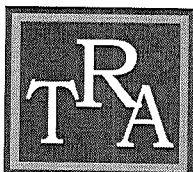
1 stopping the suction. So what they told us to do there
2 is don't put the insert inside, just put the two lines
3 together on the outside, put the sheet metal around it
4 so it can give it support and then we re-tape it. So
5 that's what we're doing now, and it works better than it
6 was working before.

7 Q. Okay. When you lose suction, that's when you see
8 more gas coming out?

9 A. Yes.

10 Q. Okay. And I think you talked a while ago about
11 when the acid liquid collects in the hoses, that messes
12 up the suction, too?

13 A. Correct. That liquid traps. If you got a long
14 hose, 50 feet long, if you got like a 12-foot span
15 between there and it's collecting a lot of gas and it
16 turns into a liquid before it gets to the draining port
17 and it makes a belly, and once that belly gets so heavy,
18 it makes like a trap and it shuts off the suction. The
19 way you see it like that, if you go and look, the pipe
20 jumps up and down because it's trying to suck that acid
21 up and it's too heavy. So what we did, we put a funnel,
22 what we call a funnel, going to a 55 drum -- a 55-gallon
23 drum and then drilled a hole in it like where the acid
24 can drip out to keep it from having to drop. So now we
25 got -- when we run a long line across the area where



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1 there's nothing to tape it to, we take number 9 wire,
2 they call it, a big wire, and we run a line across there
3 and tape that suction line to keep it from making a
4 belly.

5 Q. Oh, okay. To keep it kind of horizontal?

6 A. Yeah, holding it up, correct.

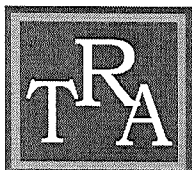
7 Q. Okay. Does the tube that has the funnel in it
8 going down to the 55-gallon drum, does that affect the
9 suction?

10 A. No, ma'am. That's draining acid. I watched it a
11 while and it goes up, and next thing you know, you see
12 the acid drip and then it will stop. That's where it
13 comes to where the suction can't pick it up and it will
14 have to drain, and then we'll open up the flow again.
15 So it stops it from jumping up is what I'm saying.
16 Yeah, that works good, too.

17 Q. Okay. What about when you're changing out a
18 section of hose, gas is going to escape while you are
19 doing that?

20 A. Yeah. There's nothing we can do about that.
21 You've got to wear a respirator and we've got to change
22 the hose so that we can get done and put the suction
23 back in service. That's all we can do there.

24 Q. Okay. Who is it that -- I think a second ago you
25 were talking about changing the T off of the common line



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1 to a PVC T. Who comes up with those ideas?

2 A. Mark Macha.

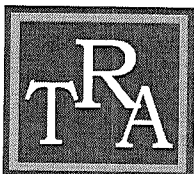
3 Q. So he's got some of that -- well, he's a
4 maintenance guy like Gene Clemens?

5 A. Right. He's our superintendent. And we've tried
6 a lot of things, let's just try that and see if it will
7 work, and one of my guys recommended that we try to use
8 PVC, but we tried PVC line at one time, but what
9 happened there, we didn't put no holes in it and the
10 whole line collapsed. We were too hot, so they come up
11 with idea why don't you drill some pin holes in it, keep
12 it cool, and then you can use PVC pipe instead of the
13 black hose, because the black hose got ridges in it that
14 makes it flexible, but every little ridge, up and down,
15 the acid sits in there, and that's where the weight
16 starts coming down. And next thing you know, you've got
17 a trap. PVC line is more of a smooth line. You know
18 what I'm saying?

19 Q. Yes.

20 A. And the only problem we got with PVC line, we've
21 got to find a way where we can run it with that lack of
22 supports everywhere, so the black, flexible line is much
23 easier to use than the PVC line as far as going to the
24 suction spot that we need to get to.

25 Q. Because it's flexible?



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1 A. Right. It's flexible and easy, light. Very --
2 not as hard to put to work, even to change out, also.

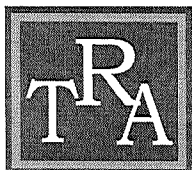
3 Q. Okay. Whenever you lose suction, I guess gas can
4 get out of these little vent holes? Like the vent holes
5 work fine as long as the suction is sucking?

6 A. Exactly, and when you lose suction, it comes out
7 the suction holes. The little bitty holes, it comes
8 out. Ain't nothing you can do except turn down -- go to
9 the nearest suction area, the valve, check from the
10 valve coming back this way to see what the problem is
11 until we can fix it again. Most of the time, like I
12 said, if you look at it, you can see the dip, so what
13 you got to do is get a man lift there and pick it up and
14 that's what causes the holes to stop sucking, then you
15 put a funnel in it, make a funnel and cut a hole in it
16 and let it drip into a bucket, a 55-gallon drum.

17 Q. About how long does it take to change out
18 sections of hose?

19 A. It all depends on that area you're working at.
20 Some of them are really easy because you're on platforms
21 and we can get to them. Some of them, we need a man
22 lift that we've got to work our way up under the hose,
23 drop the hose down and have somebody re-drill new holes
24 and pick it up. I'd say about an hour or two, the most.

25 Q. Okay. How many sections do you think there are



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1 that take an hour or two to change out?

2 A. The one on the fourth pass is the worst one
3 because we've got some cable trails that's in a tight
4 area, and then we've got to go up and then straight out
5 and come down. We've got to have two guys on the
6 platform and two guys on the man lift to handle the
7 hose, so that would be the longest one we've got to
8 change. That's on the fourth pass of the converter.

9 Q. Okay. And so how many sections do you think take
10 an hour to change out, maybe not on the fourth pass, but
11 on some of the others?

12 A. The two common lines.

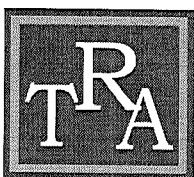
13 Q. The two common lines?

14 A. That's what we have on the fourth pass.

15 Q. Then what is the quickest hose change location,
16 would you say?

17 A. The quickest one was like the one I told you, the
18 15 foot that we go on that platform and it just circles
19 around. That don't get changed that often because of
20 the sun. Sometimes the way it turns, the flexibility of
21 the hose, it cracks, so we've got to change it out, but
22 we check on that 15-foot hose maybe 15 minutes, 20
23 minutes at the most.

24 Q. So the ones that have to get changed the most are
25 the ones that take the longest to change is what you're



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1 saying?

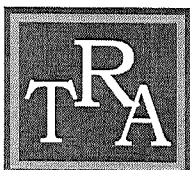
2 A. Yes, ma'am. That's the one that gets -- like I
3 told you, it turns green. The first pass of the
4 converter, that's about 60 foot up in the air, so we've
5 got to climb on the scaffold, put two guys in the
6 scaffold, two guys in the man lift, also, to hand the
7 hose. And once you get the hose up there, it's 16 foot,
8 so we've got to hand it to them, and it's flexible. And
9 once they take the old one down, they take it out, lay
10 it down on the transition piece and put the new one in.
11 That don't take long at all because you've got the hoses
12 up there. But to cut the hose, bring it up there,
13 everything together, all of this time, the gas is coming
14 out the hole because your suction is what was gone, but
15 the pipe is all laid out. So I'd say about an hour or
16 two before we get the hose changed out, both of them.

17 Q. Okay.

18 A. I mean, some of them are in the same area. We've
19 got only one hose in the bottom of transition and one
20 off the wall of the converter itself, so that's two
21 hoses right there that we change out.

22 Q. Is the hour or two the amount of time that the
23 gas is coming out there where there's no hose suction
24 right there?

25 A. Correct.



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1 Q. Because you have to do more work, like the whole
2 project might take longer, but the hour or two is the
3 time where you don't have a hose attached because you're
4 working on it?

5 A. Correct. As long as we don't have that new hose
6 attached to it, the gas will escape, so we have to go
7 down to the lead iron yard where we keep the hoses on
8 pallets, get a fork lift, bring it to the shop, cut the
9 hose, bring it to the man lift and bring it up there and
10 have it ready for when -- we can't just take out the
11 hose because...

12 Q. Right. Then it would be four or six hours?

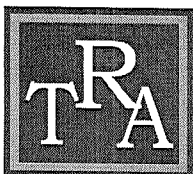
13 A. Exactly. The hose is still catching some of the
14 gas. Not 100 percent, but once we take the hose down,
15 then you can really see the gas, but that's not a long
16 time because we've got the hose there ready to put back
17 in service.

18 Q. So you're able to keep it to like an hour or two
19 of the gas --

20 A. Oh, no. The most on both hoses; okay, I would
21 say once we get the hose down, it took no more than
22 five, 10 minutes.

23 Q. Oh, okay.

24 A. Because we've got everything up there. I'm
25 talking about at the hole, not 100 percent. The hose is



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1 leaking, we know it's getting bad, so that's a whole
2 hour to go and get the hose, cut it and bring it up
3 there. By the time we get up there, it's about an hour
4 to change the hose from one place to another. I'd say
5 no more than 15 minutes that we've got the hose on and
6 we've got the gas leak under suction again.

7 Q. Okay. What size hose is the gas coming out of
8 when there's a section of it missing?

9 A. Six inches.

10 Q. Okay.

11 A. Six-inch hose.

12 Q. Okay. All right. And you said everybody around
13 at that time is wearing all of their protective gear?

14 A. Yes, ma'am, respirators, Tyveks and rubber
15 gloves.

16 Q. And you make sure they're doing that?

17 A. Yes, ma'am, like it says on the permit and JSA.

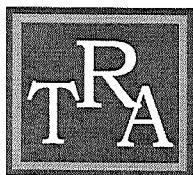
18 Q. Okay. All right. Yeah, we have a bunch of --

19 A. JSAs?

20 Q. -- papers here that say Job Safety Analysis at
21 the top. Are those the JSAs you're talking about?

22 A. That would be gas leaks.

23 Q. Why don't you take a look at this stack, and let
24 me just, I guess, for the record, they have some members
25 down at the bottom, it's KBR Number 5, all of the way to



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1 KBR 420.

2 A. Wow.

3 Q. You don't have to look at every page, but that's
4 a stack, I guess, maybe three our four inches high.

5 A. Okay.

6 Q. Most of them seem to have your name on them, so
7 you do a lot of paperwork.

8 A. Oh, some of them are mine. Okay.

9 Well, as far as the supervision lead person,
10 sometimes a worker will put my name on it.

11 Q. Oh, okay.

12 A. I'm not signing every one of them, so they put my
13 name as the lead person, which I'm the supervisor, but
14 they actually are supposed to be putting it in their
15 name as the lead person. Okay?

16 Q. Okay.

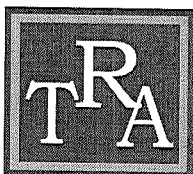
17 A. So they don't want -- I don't know what you would
18 call it, but they just put my name on it so they can get
19 away with it.

20 Q. And then that's the first page of one of these,
21 and then the second page is signed off?

22 A. Yeah, that's another part of it.

23 Q. Okay.

24 A. That's the second page and this is the third page
25 of it.



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1 Q. And you were just referring to Number 27?

2 A. This all together right here, one JSA.

3 Q. And that goes 5 through 7. Okay. And your
4 signature's not on this one anywhere, is it, KBR 5
5 through 7?

6 A. That probably was a callout because Mark Macha
7 was on there.

8 Q. Okay. So that would mean not Monday through
9 Thursday during the workday?

10 A. That would be Thursday through -- Friday through
11 Sunday most probably, that date right there, which is
12 7/22/12.

13 Q. Do they put the time on there? Could it have
14 been at night?

15 A. It's open at 7 o'clock.

16 Q. Okay. So that's morning?

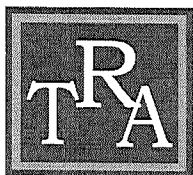
17 A. Yeah, that's in the morning at the time they
18 start. That's on 7/22. I was on vacation because my
19 birthday is 7/24. That's why he got this one.

20 Q. All right.

21 A. Jeff and Robert. You see they have chemical
22 hazard, which I always put SO2 fumes because that's what
23 you're dealing with on gas leaks.

24 Q. Or SO3; right?

25 A. SO3 at one part, and before the converter, it's



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1 SO2 fumes is coming out of the sulfur furnace. The
2 converter boiler is SO2 fumes. On the converter itself,
3 the fourth pass is SO3, which it goes to the hot house
4 and that's where they re-heat it up, I believe, and they
5 make Oleum, which is fuming gas. I'm not too much
6 familiar with the whole process of the plant. I just --
7 and I try to understand as much as I can, but sometimes
8 it gets really complicated. All I'm there for is to
9 help keep the plant running and run it safe and that's
10 it.

11 Q. Okay. The gas that you can see is SO3 gas;
12 right?

13 A. Yes, ma'am.

14 Q. So when you talked about the little blue haze and
15 the blue mist, you saw --

16 A. SO3 gas you can see better than SO2. For some
17 reason, once it hits the atmosphere, I believe SO3 gas
18 multiplies more than the SO2 gas. I don't know for what
19 reason, but that's what I was told.

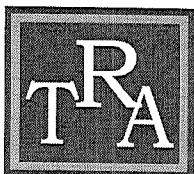
20 Q. Okay. When it hits --

21 A. The atmosphere.

22 Q. -- moisture --

23 A. Moisture, yes, yes, ma'am.

24 Q. Okay. This is a day you're not there, so we'll
25 find one on a day where you're there, which is going to



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1 be most of them, I think.

2 This is KBR 11 through 13. If you could, let me
3 as you a question about this. Oh, wait. I've got that
4 wrong. Okay. This one goes together, I think; right,
5 this 11, 12 and 13? See these pages at the bottom, 11,
6 12 and 13?

7 A. Yeah.

8 Q. This would be one --

9 A. That's one JSA.

10 Q. One JSA, and it's sort of got the numbers going
11 in the other direction, I guess. That's right?

12 A. Yeah. Normally that's how it is. That's how we
13 put them together right here.

14 Q. Okay. And then this is -- okay. On the front
15 here on Page --

16 A. Okay. This one is 10, but normally this one is
17 in the front. Okay. We've got them mixed up. That's
18 what it is.

19 Q. That's why we have these numbers on the bottom.

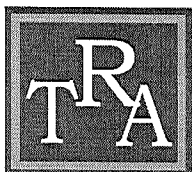
20 Let's see. Here's 14, 13, 15 and then what
21 number is this?

22 A. It's 10.

23 Q. Ten, 11.

24 A. Okay. Ten, 11.

25 Q. We just need page 12.



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1 MS. WEINER:

2 Twelve was blank, I think.

3 MS. BARNEY:

4 Oh, it is?

5 Oh, this is 12. It's blank. That helps
6 divide them. I think that's the point of the blank
7 ones, it helps divide.

8 BY MS. BARNEY:

9 Q. So if you look at pages 13, 14 and 15 for me.

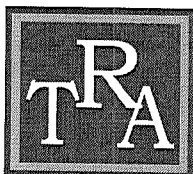
10 A. Okay.

11 Q. On this front page, Number 13, up at the top it
12 says on job -- what does it say right there where it
13 says "Job Task Description," it says, "repair gas leak"?

14 A. Repair gas leak on converter.

15 Q. So does that mean at the morning meeting somebody
16 knew there was a leak and they sent you out to fix it?

17 A. It's -- like I said, sometimes it depends where
18 it's at. If it's a hose, sometimes the hose might be
19 away from the converter, but it leads to the converter
20 as far as the suction part goes. So if I said
21 converter, that's where the gas leak is at, but the
22 suction part, we got hoses going to the S03 unit, which
23 has got four -- let me see -- four common lines coming
24 from the S03 unit that we can fix over there instead of
25 going to the converter, which at that part, you don't



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1 need no respirator, but what we do sometimes, we just
2 put it on there just in case, like if needed, in other
3 words. They got to make that decision themselves on
4 that part.

5 Q. Okay. And they have the respirators available?

6 A. Oh, yes, ma'am. Oh, yeah.

7 Q. So on this one, where it says -- because some of
8 these say "check".

9 A. Yeah.

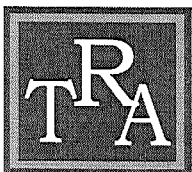
10 Q. You know, "check the hoses," and some of them
11 say, "repair gas leak."

12 A. Correct.

13 Q. So if they say "repair a gas leak," then y'all
14 know there's a leak?

15 A. Correct. We know we have a leak. That's mostly
16 like Tuesdays, Wednesdays, when something do happens
17 during the week that we know where the gas leaks, we
18 write another permit and put a JSA with all of the
19 permits. Monday and Thursday, normally we check the gas
20 leaks, and that's our normal routine.

21 Q. Okay. So on Mondays and Thursdays in the
22 morning, if you have one that says, "go check the
23 leaks," if you go out there and there are leaks, is
24 there anything that you have to write up to say,
25 "there's a leak here and a leak there, and we did this



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1 and we did that"?

2 A. No. The only thing that's different there is
3 that in checking on leaks, they go and check it. If
4 it's something that's bad or something you got to fix,
5 they just put this on here and then they go on and fix
6 it.

7 Q. Okay.

8 A. They don't come back. I don't have to write
9 another permit or anything like that.

10 Q. Okay.

11 A. This is what they go by right here.

12 Q. Okay. So if your guys got out there or you go
13 out there and you find holes and things that you fix or
14 replace, there's no form that you have to fill out that
15 says, you know, "We found a hose 40" --

16 A. No, ma'am.

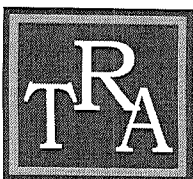
17 Q. I mean -- I'm sorry. "We found a hole 20 feet
18 from the converter in a section of hose, and we did X, Y
19 and Z," you don't have to write that down?

20 A. No.

21 Q. Okay. And nobody told you you have to write that
22 down?

23 A. No, ma'am.

24 Q. So you're fixing leaks and doing these things and
25 your supervisors are just counting on you to get it



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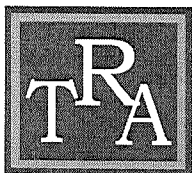
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1 done?

2 A. Correct.

3 Q. They haven't told you to call them out there to
4 see every leak before you fix it?

5 A. I have called them already. When we can't fix
6 it, when there's nothing that -- in other words, they
7 got to come down with a plan, and that happened a couple
8 of times because I -- especially on this CIP area. When
9 one of my guys went up there to fix a leak, we checked
10 the hose, the hose had a lot of suction, but he told me
11 that the box the was kind of shaking, so that meant that
12 the pressure was coming against that and he told me that
13 there's not enough suction to pick up the gas. I could
14 see the gas coming from the bottom, so I went and I went
15 talked to my superintendent, which is Mark Macha, and he
16 called the DuPont guy, Gene Clemens, to come look at the
17 gas leak. He said, "Well, what we going to do?" I
18 said, "Put another suction hose -- another common line
19 on it, make sure we can catch as much as we can and then
20 we're going to come down and try to see if we can unwrap
21 it and look at it and see what's going on back there."
22 And the next week, I believe they shutdown. We stripped
23 off the area, but it's where we can't get to it to fix
24 it. That's when we decided that it's coming from the
25 inside. So what they did, we just remodeled the hoses,



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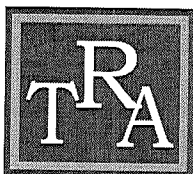
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1 the rack, the box to where we can catch it, so we're
2 doing the best we can with that lead, and that's the one
3 we got four hoses on it to collect the gas. And we're
4 doing a pretty good job as far as collecting it, and
5 it's not that hot. The converter is hotter than the CIP
6 area as far as that gas is concerned, so we're doing a
7 good job on the CIP area.

8 Q. Okay. On any given day, there's no way to say
9 there wasn't any SO3 gas leaks in the process area;
10 right? I mean, you're doing the best you can, but you
11 can't say it's 100 percent captured?

12 A. No. It's never been 100 percent. We do the best
13 we can with what we have with the material that we have,
14 and at times, in the second pass of the converter, we
15 put a box. We got a suction hose and it started leaking
16 through the walls, little bitty specks. We put sheet
17 metal and we cork it. Okay? Stopped it for a little
18 while. The next thing you know, it comes further up.
19 Well, we had to re-modify our scaffold because we're up
20 in the air. We re-modified the scaffold. It too us a
21 while. All of this time we can't get do it, the gas
22 coming out. So we go up, got the scaffold and put
23 another piece of sheet metal. Well, now we're coming to
24 the top area of the converter, and next thing you know,
25 you got the roof going this way. So now we got all of



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1 this contained, but now the gas is coming out middle
2 ways of the converter, and we can't get there. There's
3 nothing else we can do except shutting down the unit
4 completely to undo the insulation where we can fix the
5 leak itself at the bottom. Like I said, we're going to
6 try to collect as much gas as we can until the shutdown.
7 The main shutdown in October.

8 Q. Okay. About how many times in the last two years
9 would you say DuPont has taken like a hot shutdown for
10 some period of time, like eight hours or so to try to do
11 repairs?

12 A. In the past year?

13 Q. Year or two.

14 A. Past year, I'd say five times we shut down to
15 repair gas leaks.

16 Q. Okay.

17 A. As far as welding on the gas leaks itself.

18 Q. Okay. And then how many before that in the year
19 before, would you say?

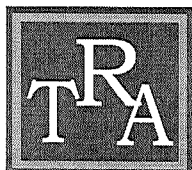
20 A. I'd say about the same, like five, six times we
21 shut down.

22 Q. Okay. And --

23 A. Sometimes -- I'm sorry.

24 Q. No. That's okay. Go ahead.

25 A. Sometimes we shut down for other purposes that's



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1 going on with the plant, like strainers, main blower
2 wheel going bad. Well, when have a chance, we take care
3 of the gas leaks and we don't work on the other stuff,
4 so it's not only for gas leaks that they shutdown, so
5 when they do shutdown, we repair gas leaks as much as we
6 can.

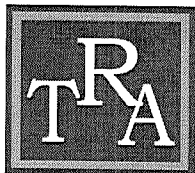
7 Q. All right. Do you know what you're going to have
8 to do during this cold shutdown?

9 A. Coming up?

10 Q. Yes.

11 A. They're keeping me as much out of the situation
12 this year than ever, and most of it, the big part about
13 it is my hard of hearing, because we normally go through
14 scheduled meetings, and like in here, it's beautiful, me
15 and you talking, there's no interference, but if
16 somebody's talking in that corner, it disrupts my
17 hearing completely and it stops me from going to the
18 shutdown meeting. So, now, Mark Macha is in total
19 control. He takes care of all of the meetings, writes
20 down anything we've got to do. Now, he comes back to
21 the office, then he'll call me and then I'll get with
22 him one-on-one on what we're going to be doing on the
23 shutdown.

24 Q. Okay. All right. So do you know right now what
25 you're going to be doing, or you don't know that yet?



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1 A. I know some of the job. I don't know all of the
2 job. I know that the leaks is taken care of by a
3 contractor, which is Volks' contractor, I believe.

4 Q. V-O...

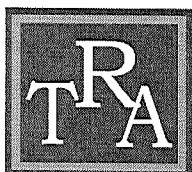
5 A. V-O-L-K-S, Volks.

6 Q. Okay.

7 A. And I believe they're going to take care of the
8 first transition piece, the converter first pass, and
9 inside the fourth pass is VIP that's going to be going
10 there and making the weld repair, inside of the CIP and
11 the HIP and the converter fourth pass. We're not going
12 to be doing none of that.

13 Q. Okay. The first sheet in this stack that we
14 looked at I think is dated July of 2012, and I believe
15 KBR is representing that they just don't keep this JSAs.

16 A. No. They have to turn them in every afternoon.
17 They turn them in to me and then I look over them and
18 see -- and most of this, when they turn them in, is to
19 make sure that the job is completed or it's not
20 completed for my scheduling purpose, but this personally
21 is for their safety. It's a JSA, Job Safety Analysis.
22 They go over this area, they get everything that they
23 need to do to make the job safely, and in the afternoon,
24 when they come in, I make sure nobody gets hurts,
25 scratches and stuff like this and see if the job is



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1 finished or 80 percent finished or whatever, to see if
2 I've got to reschedule it for the next day or not.
3 That's all.

4 Q. Okay. All right. How does KBR keep track of
5 what DuPont owes KBR for work? Like are they paid by
6 the hour?

7 A. Yes, ma'am. We get paid by the hour.

8 Q. Okay. You as an employee of KBR?

9 A. Yes, ma'am.

10 Q. Okay. Do you know how KBR bills DuPont, how that
11 works out?

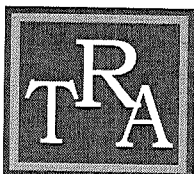
12 A. I have no idea. All our time goes to the
13 Pontchartrain, DuPont Pontchartrain in LaPlace, and a
14 woman named Wendy Jenevies (sic) takes care of our
15 timesheets, which Mark faxes her the time every day.

16 Q. What's her last name?

17 A. Jenevies. Wendy Jenevies. I don't know how to
18 spell it, so...

19 Q. Okay. So she actually writes the checks to the
20 individuals, or just to KBR?

21 A. She gets the information on everybody's time and
22 she sends it somewhere. I don't know where the main
23 office is at or whatever. The DuPont in Delaware, I
24 believe, and she gets the checks made. When she gets
25 them back, they get them back to us in Pontchartrain, so



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1 she's the one that takes care of that, I believe.

2 Q. So whose name is on your check, KBR or DuPont?

3 A. No. It's KBR.

4 Q. Okay. I'm going to show you --

5 MS. BARNEY:

6 I'm not going attach all of the other
7 pages that we've been looking at if, its that okay. We
8 referred to them as Bates numbers.

9 MS. WEINER:

10 That's fine.

11 BY MS. BARNEY:

12 Q. I'll show you a document that's Bates labeled 628
13 to 641, prefix KBR. I'll ask you to look at this one
14 for me. Let me get these out of the way for you.

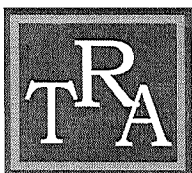
15 And just for the record, there was a request for
16 documents from KBR, and that's what these are, the stack
17 of JSAs that you saw. And then this document were
18 things that KBR gave us basically.

19 A. Yes. Okay.

20 Q. So this is maybe a spreadsheet or chart that you
21 haven't seen in this form before. Do you recall ever
22 seeing a chart set up like that?

23 A. Huh-uh. I've seen this already, but I know Mark
24 Macha deals with this.

25 Q. Okay.



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1 A. This is identification on what craft we in, M719.

2 Q. Okay. So which craft, is that what you mean,
3 which craft? Is that what you said? I didn't hear that
4 word.

5 A. I'm not quite sure, but I know this is our
6 identification number.

7 Q. That's where it says "address number," is your
8 notification number?

9 A. 5633, that's my identification number at DuPont,
10 and that gives you my address, phone number and
11 whatever.

12 Q. Oh, I see. So under "Job type" --

13 A. Type.

14 Q. -- it starts with an "M", does that -- do you
15 know what that means?

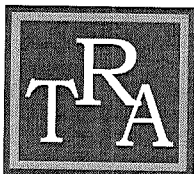
16 A. Huh-uh.

17 Q. Okay.

18 A. Mark Macha takes care of this paperwork here.

19 Q. Okay.

20 A. He sends in -- most of the time we schedule
21 together, and then what we do from there, he's got a job
22 number that he's got to put it down on, put the job
23 number down on the time sheet and then sends it to Wendy
24 every morning or the next day of work, and these numbers
25 are on there.



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1 Q. Job type numbers?

2 A. Yeah.

3 Q. Okay.

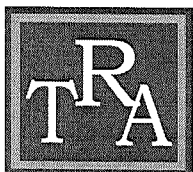
4 A. So I don't know if it's a job number for the type
5 of work we do at the plant or if it's just like
6 pipefitter or helper or whatever. I have no idea.

7 Q. Okay. Do you know if there's a certain number
8 assigned to working on gas leaks versus working on
9 something else?

10 A. We've got different -- we have job numbers for
11 that that I know of, because when Mark's not there, I'm
12 responsible to sending in the time, and when Mark goes
13 on vacation, I'm his backup to him, so I take over that.
14 So I send in the time sometimes, but I never did do
15 this. This is for records, I guess. I don't know what
16 that's for.

17 Q. All right. Okay. I'll show you this document
18 that's numbered KBR 689 through KBR 722 and ask you to
19 just kind of glance at that. It looks like it might be
20 BE&K work history.

21 A. I billed them out already, but this is years ago,
22 and they actually took that away from me. That's just
23 schedule, work schedule hours that you work, unscheduled
24 work. Like I used to do the planning and scheduling,
25 and I planned my whole week as far as what we were going



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1 to do Monday, Tuesday, Wednesday and Thursday, but
2 something would come in between there that we had to go
3 do, that was unscheduled work, emergency, that's
4 shutdown, gas leaks or whatever we've got to go work on,
5 that's emergency, how many hours you had to work on
6 there and you had to mark it down. That's per week.

7 Q. All right. And that's what those are going back
8 to the time when the company was called BE&K?

9 A. BE&K, correct. That's not KBR.

10 Q. Okay.

11 A. And I've been there 24 year, and I believe they
12 went through four or five contracts.

13 Q. Company names, you mean?

14 A. All different company names, but I still hung in
15 there.

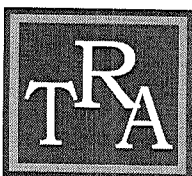
16 Q. That's pretty good.

17 A. Jack White was the first one, and they were from
18 Geismar.

19 Q. I'll show you a similar looking document -- this
20 may be for a more recent time period. It's Bates
21 labeled KBR 723 through 755 -- and ask you to look at
22 that one.

23 A. It's like a shutdown thing is where we put those
24 in. Heat up process.

25 Q. What's the first date you on see on this chart?



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1 A. I'm reading this.

2 Q. October 2011?

3 A. 10/7.

4 Q. Okay. So does this appear to be a chart of jobs
5 done?

6 A. That's October of 2011. That's the year before
7 last. That's the last shutdown we had.

8 Q. Okay.

9 A. And it says, "Waiting on blower wheels," so
10 that's when we were having problems with the blower
11 wheel and they couldn't run the plant wide open. They
12 had to cut down rates for a good while.

13 Q. Okay.

14 A. But it says right here, "Heat up process, start
15 to get plant back online. Open up HIP and CIP under
16 east manways, close HIP." That's shut down work.

17 Q. Okay.

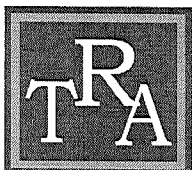
18 A. And the plant's running again for sure.

19 Q. Can you tell in this chart where you see the
20 first entry that has to do with the leaks we've been
21 talking about today?

22 A. If I see any leak on here? That we've been
23 working on, is what I'm saying?

24 Q. Yes.

25 A. Not so far.



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1 Q. Okay. And you're on October -- you're on
2 November 14th, 2011.

3 A. "Clean..."

4 Q. And then Page 726 starts with December 9, 2011
5 and goes through December 20.

6 A. Huh-uh. There's no leak repairs on this one.
7 Right here, 2/13/12, "Gas leak on converter,
8 remove cable tray. Repair ground wire on north gas..."

9 Q. Okay.

10 A. "Repair suction hose on converter gas leak."
11 2/15, "Repair suction hose on converter gas leak, SO3
12 tank car heater repair."

13 Q. Okay.

14 A. And that's 2/16. "Converter gas leak," 2/19.

15 Q. Of 2012?

16 A. Yeah, right here (indicating).

17 Q. That's on Bates page 728.

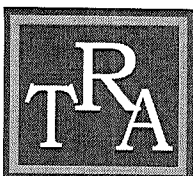
18 A. Right.

19 Q. If you look up at the top of that page, it talks
20 about adjusting the hoses on leaks.

21 A. "Adjust hoses on CIP exchange and gas leaks,"
22 correct.

23 Q. And that's February 1 of 2012?

24 A. I actually call it CIP. It's a CIP exchanger.
25 That's what they call it.



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1 Q. Oh, okay.

2 A. There's a CIP and a HIP one is hot interpass
3 something exchanger, and the other one is cold, so the
4 CIP and the HIP, correct.

5 Q. Okay.

6 A. "Gas leak on CIP," 3/12.

7 Q. And you're looking at page KBR 729?

8 A. And high tower gas leak -- okay. I remember that
9 one. That was repaired. That was a gas leak on the new
10 I-pass tower where the two-inch nozzle was leaking in
11 the well, so we cut two half-inch plates together to go
12 around the nozzle, put it together to weld it. That's
13 what that was, a gas leak on the CIP.

14 Q. So the leaks, except for maybe the one you just
15 mentioned that y'all fixed --

16 A. Right. On the I-pass tower?

17 Q. Yes, on March...

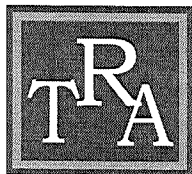
18 A. 3/12.

19 Q. March 12 of 2012, the leak entries that you
20 started seeing on page 728 are the same equipment that
21 we've been talking about today, some of it?

22 A. Yeah, on the CIP, correct.

23 Q. Okay.

24 A. Well, it's different -- it's different areas.
25 When we first started, it was like holes on the roof.



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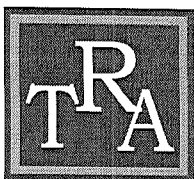
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1 Q. Okay.

2 A. Okay? And we put a box and we put the holes, got
3 with -- when it started getting worst, we didn't have
4 enough hose to collect the gas anymore, Gene, the DuPont
5 engineer, went back in his prints and found how the
6 thing was made, the HIP and the CIP, and said the way it
7 was made was like angle lines like this (indicating),
8 coming to a V and the leak was somewhere way out here,
9 well, the gas would follow that channel line and the gas
10 would come up. So, actually, the hole was right here
11 (indicating), so what we started doing is undoing the
12 insulation at the bottom to try to find where the actual
13 leak was so we could catch it.

14 On the HIP area, finally found one that we
15 actually repaired. We shut the plant down, we had a
16 crack about eight to 10 inches long and we put a piece
17 of flat bar and you weld it back up, and when went back
18 and got up there, it was fixed.

19 On the CIP area, it's engineered differently.
20 What they did on the HIP was not done on the CIP. The
21 CIP, when they put the top part of the CIP down, it's
22 like a box, and they put it on top of this big ol' tank,
23 but at the HIP, they didn't have enough place to weld
24 the outside where it goes over it, but they have about
25 an inch where it comes up and the other piece of the CIP



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1 attaches onto that, to that box. The welder didn't have
2 enough place to weld underneath, so they went inside of
3 this CIP area and welded all of it, where it goes like
4 this (indicating), right in this area.

5 Q. Where the two connect?

6 A. Correct. Where it slides on top of each other.
7 They welded all of that up. I would say, my
8 understanding of what I heard is that one of the ducts
9 that came up from the area in the plant area was not
10 insulated all of the way to the CIP area, that caused
11 that gas come out too fast and turn into a liquid too
12 fast, so when it got to that area there, it ate up that
13 weld from the insides and we can't get to it. To get
14 inside, it's got to be a three-week shutdown. They got
15 to fill it with nitrogen and let it cool down to 100
16 degrees before anybody can go in there to make repairs,
17 so they're waiting for that to happen in October coming.

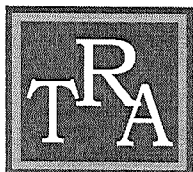
18 Q. All right. If you look further towards the back
19 of this document, like I think this is page KBR --

20 A. 746.

21 Q. Yes, 746.

22 You see some entries midway down where the CIP is
23 leaking.

24 A. Okay. "Leak on the fourth pass of converter,
25 weld repairs for your pump tank, unload materials used



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1 for spent Furnace," on 5/29.

2 Q. And this is in May of 2013?

3 A. I'm sorry?

4 Q. This is in May of 2013 is when this page is
5 reflecting?

6 A. The 29th right here.

7 Q. Oh, June. Is that May or June 2013?

8 A. Yeah, June.

9 Q. Okay.

10 A. No. Actually, May 29th.

11 Q. Okay. So that just confirms what you were saying
12 earlier about these leaks going on for about two years,
13 going back to 2011?

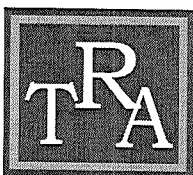
14 A. On the forth pass?

15 Q. The leaks -- I guess the leaks generally on the
16 HIP, the CIP and the converter.

17 A. Oh, yeah. Yes, ma'am. That's 2013.

18 Q. Okay.

19 A. Yeah. We've been knowing this for over a year
20 now on the fourth pass. It's not as bad as what it is
21 now. It's just getting worse and worse and worse, but
22 we've been knowing then gas leak for a while. It
23 started at the first pass is where it started at, and we
24 repaired that one. Now we're going to the second pass
25 and repaired the second pass. Now third pass is acting



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1 up. We got all them three fixed now, but the fourth
2 pass is what I'm saying is from the inside. That's the
3 worst part. All of the other ones we can get to. It's
4 just the way that it's been engineered that we can't get
5 to the gas leak because it's too narrow, so we can't do
6 nothing with it. We got to catch the gas with the hoses
7 and put it back in the plant system. That's all we can
8 do until they shut down and fix it from the inside.

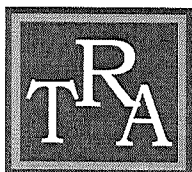
9 Q. Okay. All right. When is the last time would
10 you say that you went to the perimeter of the plant site
11 to see a gas cloud that was leaving the site? Do you
12 remember about the last time you did that?

13 A. That was leaving the site?

14 Q. Yes.

15 A. I was called out maybe two weeks ago, I would
16 say, and when I got to the plant, it was in the
17 afternoon, late that afternoon, 5 o'clock, the hose --
18 they had a bad rain storm that passed and that causes
19 some of the hoses -- two hoses were melted. And it
20 takes me a half hour from my house to get to DuPont and
21 they called me and said they had a bad gas leak on the
22 fourth pass, and that was like two weeks ago. Both
23 hoses collapsed, and I had to go and change them out.

24 Q. Okay. So that was one of the times where you
25 went to the edge of the site and you could see it



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1 leaving the site?

2 A. The metal hose -- I'm sorry. The hard piping
3 instead of the flex metal hose, we changed that over.

4 Q. That's when you changed the --

5 A. I changed the hard, metal pipe instead of the
6 flexible, because the metal hose was not lasting. It
7 was getting eat out, and that's what happened. Once
8 that ate out, the hose melted, the plastic one, so we
9 decided to back up the rubber hose and then come with a
10 metal hose with a PVC pipe header, which would make it
11 cooler and make it last longer.

12 Q. How far could you see the gas cloud traveling on
13 that time two weeks ago?

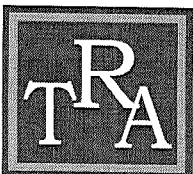
14 A. I know what I'm looking at and I know what I'm
15 looking for. On top of the Sunshine Bridge, if I look
16 at the stack at DuPont, I can actually see the gas.

17 Q. Okay. Now, the gas from the leaks is not coming
18 through the stack; is that right?

19 A. No, ma'am.

20 Q. But you can just see where the stack is, and so
21 you know -- from the bridge, so you know what the gas is
22 doing?

23 A. Exactly. I know exactly where to look at and
24 what I'm looking for, and I can see it coming up and
25 then going down.



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1 Q. Okay. All right. How many times would you say
2 you've seen the gas cloud above DuPont that was coming
3 out of those leaks from the Sunshine Bridge?

4 A. I'd say about like five times since we've been
5 having trouble with this converter right here. Other
6 than that, we've been collecting gas, but right now, I'm
7 going to say it's really bad. It's getting worse and
8 worse by the day.

9 Q. Okay. The five times that you saw it from the
10 bridge, would that be over the last two years or --

11 A. The last two years, I would say I've seen it real
12 bad five times.

13 Q. And "real bad" means it's off site and --

14 A. It's real bad.

15 Q. -- you can see it from the Sunshine Bridge?

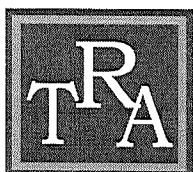
16 A. Yeah.

17 Q. Okay.

18 A. Now, I'm not saying it went to 44 every time.
19 One time it went towards Ormet. It's like a southwest
20 wind, and that where's that bad storm was like
21 switching, moving, but in that category, it goes more
22 into the wooded area than across the road itself.

23 Q. Okay. And you can't stop your vehicle on top of
24 the Sunshine Bridge; right?

25 A. No, ma'am.



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1 Q. Okay.

2 A. I wouldn't do that.

3 Q. So these fives times have just been when you
4 happen to be on top of the Sunshine Bridge as you're
5 driving?

6 A. Correct.

7 Q. Okay. Is there any other vantage point that
8 gives you another way to see the gas leaving the site?
9 I guess, maybe the cameras?

10 A. When you're low, it's more difficult to see it
11 because you're looking up into the sky, but when you're
12 up looking down, you can see it better.

13 Q. Okay.

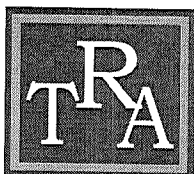
14 A. That's why maybe on the Sunshine Bridge I can see
15 better than when I get -- because I know exactly how bad
16 it is before I even get to the plant, and I can probably
17 almost say what it is before I even get there.

18 Q. Which piece of equipment, you mean?

19 A. I can almost call my guy and say, "Cut 24 feet of
20 metal hose," because I know what's going on, so I've
21 been dealing with this for quite a few years now, and I
22 know exactly what's going on with this.

23 Q. What about Gene Clemens, is he knowledgeable like
24 you are? Does he know what's going on, too?

25 A. He's the one that was over the HIP and the CIP



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1 construction when they put it together, so he knows more
2 about it than me as far as that's concerned inside. As
3 far as the converter, he knows a lot. I guess he
4 studied the blueprints, and he inside himself the last
5 shutdown when they repaired the transition piece from
6 there, so he's pretty knowledgeable about what's going
7 on.

8 Q. Okay. How many times would you say you've been
9 out at the plant after dark in the last two years? Lots
10 of times or just --

11 A. On callouts, you mean?

12 Q. Just physically present at the site when it's
13 dark.

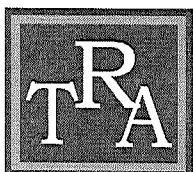
14 A. When it's dark?

15 Q. Yeah. I'm sorry. I'm not talking loud.

16 A. I'm sorry.

17 Q. Yeah, when it's dark.

18 A. We don't actually work on gas leaks after dark.
19 It's unsafe. And I have been called 7:30, and I told
20 these guys, "By the time I get there, it's going to be
21 dark." And we work already with lights. We worked on
22 lights to capture the leak because they told me it was
23 bad, and when I got there it was. A couple of hoses
24 collapsed and we fixed it, but Mark don't like the idea
25 of us working at night, especially at heights like that.



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1 So we try to tell them not to call me out unless we can
2 work on the gas leaks. In other words, he said we're
3 not going to put nobody in harm's way because of gas
4 leaks. It's too dangerous.

5 Q. Okay.

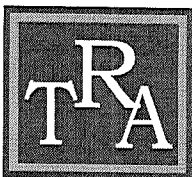
6 A. So what they've done in the past, they lower the
7 rates down a bunch of times until we get there. We
8 schedule early in the morning for us to go and get the
9 gas leaks done.

10 Q. Okay. So there have been occasions where DuPont
11 would cut back the rate, meaning they wouldn't be
12 operating the plant as --

13 A. As high -- as much gas escaping the plant than
14 what is at that point. From 2,150 tons a day down to
15 14, which is the least they can go to, 1450, I believe.
16 Cut down the rate and let them still run the plant, and
17 not have as much gas leaving the site as what they were
18 having at 2,100 tons, and they scheduled me and my guy
19 at like 5 o'clock in the morning to go get the gas leaks
20 captured and fixed where they can come back up to their
21 rates.

22 Q. Okay. And when you do that -- we've already
23 talked about it, but you can't capture all of the leaks
24 and all of the gas, but you can get that big gas --

25 A. Sometimes we could depending on what hoses got



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1 affected. If it's a box, we got to insulate it to build
2 a new one, and at that time we keep the load down until
3 they wait on me to tell them I'm done. And before that,
4 they cannot come up until I'm completely done with my
5 jobs.

6 Q. Okay. All right. Have there been times where
7 you got there in the morning and they hadn't cut back
8 the rates, but you had a big leak going?

9 A. Not really.

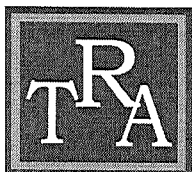
10 Q. Okay.

11 A. We had a couple of leaks when I get there in the
12 morning, but not excessive, just a regular leak repair
13 we got to get.

14 Q. Okay. So when you think of excessive, you're
15 thinking about something that's heading across the
16 highway, it's leaving the site, you can see it?

17 A. That's a big leak. When it's -- I don't know
18 what you call a big leak, but when it's going towards
19 the highway, I would say 50, maybe, almost 100 yards
20 from the leak area to the highway, that's almost 80
21 yards, maybe more than that. And most of the time, it
22 stays in there. A bad leak will go over that road, and
23 I never been to the plant in the morning time where it
24 was not accessible to where we could fix it.

25 Q. When you see this gas leak that's going, like you



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1 said, 80 yards, has it moved 80 yards to where you see a
2 gas could and that gas cloud is 80 yards away from the
3 plant, or is it kind of one trail where you can see kind
4 of the gas leaving the plant and you can actually see it
5 extending 80 yards?

6 A. It's like a trail.

7 Q. Okay.

8 A. The gas don't go wide. It stays like where it's
9 at and comes out, and you can see it go down. It don't
10 stay up. I guess the gas is heavier than air, and it
11 goes down faster. I'm not too much of a chemistry guy
12 on that part, but the gas don't go straight up.

13 Q. It doesn't keep going up; it goes up and then
14 starts coming down?

15 A. And it comes down.

16 Q. So when you see it 80 yards from the plant --

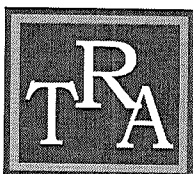
17 A. It's almost down on the ground already.

18 Q. Okay. And there's sort of a trail you can see
19 where it came from?

20 A. That's correct. It's like a little fog you can
21 see.

22 Q. All right. I think we covered this with other
23 witnesses, but I'll just confirm with you that there's
24 no monitors or anything out there --

25 A. No, ma'am.



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1 Q. -- that y'all can use --

2 A. Not us.

3 Q. Okay.

4 A. We don't monitor nothing. The guy -- T.J. Ozbun
5 is the plant environmental guy, you call that, and he's
6 the one that's taking care of the -- I don't know what
7 you call that, the sniffing part of the evaluation, how
8 much is going off the plant and stuff like that.

9 Q. He's the one trying to write the reports --

10 A. Yeah.

11 Q. -- that say, "It was this big of a leak or that
12 big of a leak"?

13 A. Correct.

14 Q. Okay. Do you know where he gets his information?

15 A. I have no idea.

16 Q. He doesn't get it from you?

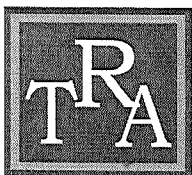
17 A. (Witness shaking head).

18 Q. No?

19 A. Huh-uh.

20 Q. Okay. Has he ever come to you to, say, you know
21 like on a time where you saw the leak from the Sunshine
22 Bridge, has he ever come to you and say, "Can you help
23 me calculate how big it was?"

24 A. No. He normally does that part by himself. He
25 never contacted me for no reason. The only one that



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1 asks me questions on that part was the plant manager.

2 Q. Okay.

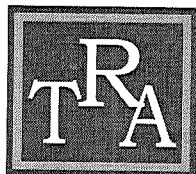
3 A. Because at the time they were calling out for
4 small leaks that -- he was kind of getting out of shape
5 with it or whatever, and he asked me how far was the gas
6 going off site. I said, "Well, to be honest with you,
7 Tom," I said, "I went ride to the 5 and 6 rack, and it
8 was bothering the two guys that was loading, but it
9 wasn't going off site." The gas was that low already.
10 He's about the only one that ever asked me that
11 question.

12 Q. Okay. So the gas was kind of landing by the rack
13 where the DuPont employees were working?

14 A. Right. Not off site. It was on site.

15 Q. And it was near a rack where DuPont employees
16 were working, but not off the site?

17 A. Correct. DuPont, they're on the north side of
18 the plant, which is with a south wind. Then the CIP is
19 on the other side of the plant, so by the time the wind
20 got to the CIP area, the gas was -- because I went
21 riding myself in the truck and I could smell it because
22 I'm used to that and I could open the window and see the
23 gas and I could smell it, but I went all of the way
24 towards the fence area, which is another 30 yards. I
25 could hardly smell it, so it actually had already



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1 settled down by the 5 and 6 rack.

2 Q. So Tom was getting a little frustrated as to
3 y'all being called out if the gas -- they weren't sure
4 the gas was actually leaving the site?

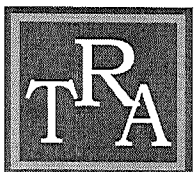
5 A. Correct.

6 Q. Okay.

7 A. They sometimes are held up until we get there in
8 the morning, and when we couldn't work if it's thunder
9 or lightening or whatever, they waited for us to callout
10 when it cleared up.

11 Q. Is it more expensive for y'all to come out in the
12 middle of the night than it is to deal with it the next
13 morning?

14 A. Well, the middle of the night, it takes longer --
15 the job takes much longer to do because of the night. I
16 mean, first of all, you've got to hook up light stands.
17 Most of places that you hook up the light stands, you
18 can't see what you're doing and it's unsafe. And these
19 guys that I work with are mostly frustrated with
20 repairing gas leaks already, and, you know, they're
21 telling me that, "We can't do this." "That's not going
22 to work." "We can't do this." "We can't do that,"
23 so -- and I've got to kind of listen to these guys a
24 little bit and say, "Well, let's try this instead." And
25 that's part of my job. I work for DuPont. Part of my



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1 job is to collect the gas, so I'm doing what's best to
2 take care of them.

3 Q. So the guys under you are frustrated, like Robert
4 Cayette and Jeff Guitreau and those guys?

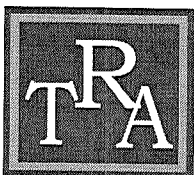
5 A. Yeah. They're kind of frustrated as far as gas
6 leaks, repairing gas leaks. They at their very end of
7 it.

8 Q. Okay. All right. What about DuPont folks; is
9 there anybody there that -- have you gotten the
10 impression that anybody that's still working there is
11 frustrated with the gas leaks?

12 A. Not them. They don't mess with the gas leaks at
13 all. All they do is they run the board. They're
14 operators. Gene that came, only time he comes to the
15 CIP area is when I call him to come look at something,
16 and besides that, they -- it's not -- they take care of
17 their business.

18 Q. Okay. So they know it's happening, but they
19 don't have to work on it?

20 A. That's correct. We got the Tyvek suit. If it's
21 98 degrees, we got to wear a Tyvek suit, respirators,
22 and we're against a wall that's 217 degrees. And Gene
23 went up there one time with what he had on, and when he
24 come down, he said, "No way. These guys are not going
25 back up there without air conditioners," so they rented



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1 an air conditioner for us with some tubes that wherever
2 we work at on gas leaks, we got air conditioning to cool
3 off.

4 Q. When did that start?

5 A. That started beginning of Summer. That's in
6 June. About three months ago. We still have the air
7 conditioning available for us.

8 Q. Is that making it a little bit better --

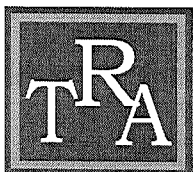
9 A. Way better.

10 Q. -- from the heat standpoint?

11 A. Oh, yeah, definitely, but it took one of these
12 guys to experience that them self what these guys were
13 going through to go ahead and do something about it.
14 Just the words and the sentence was not doing any good
15 at all, so when they went up there them self and just --
16 they didn't do actual work. They went and looked at
17 what we had, and they didn't take more than 10 minutes
18 up there. And when he come down, he was soaking wet.
19 He said, "Oh, no. These guys are going to have air
20 conditioning."

21 Q. Wow. Must have been pretty hot.

22 A. Them guys were suffering up there, I'm telling
23 you, and we've been telling these guys that, and finally
24 they come through and helped us out. And we're still
25 fighting it today, so...



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1 I mean, like I said, that's part of our job,
2 that's part of work, but sometimes when you put somebody
3 in harm's way, especially heat stress, stuff like this,
4 and our safety man will tell us, "You've got the time to
5 do this job safely." He keeps plenty of water. They go
6 get coolers. We got all of the water we want to drink.
7 We got air conditioning. You want to take a break, I
8 can't tell them nothing. You take a break.

9 Q. Do they have water up at the job that they're
10 working on --

11 A. No, ma'am.

12 Q. -- or do they have to leave to go get the water?

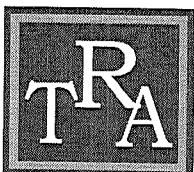
13 A. They got to leave. You have to come down where
14 they got a little shade, air conditioning, water
15 coolers. You can sit down and take a break.

16 Q. Why can't they drink the water up at the --

17 A. Because of gas leaks we have, the acid drips and
18 stuff like that, it's not accountable for. We cannot
19 have an open container in the unit itself because of
20 leaks, all of the stuff falling from the stack or
21 anywhere else.

22 Q. Okay. Do you know whether or not it's easier to
23 see the gas, the SO3 gas leak at night or --

24 A. Oh, definitely. You can see it way better at
25 night than in the daytime because I experienced that



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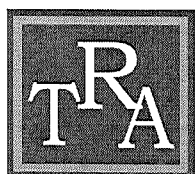
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1 myself, and they called me out one night, 7 o'clock, I
2 believe, at the house. It took me a half hour to get
3 over there, so it's almost dark already, and by the time
4 I left, it was dark. The operator says, "You leaving?"
5 I said, "Yeah. I did as much as I can with that.
6 That's all I can do." She said, "Look." I said,
7 "That's gas from the CIP. That's the one we cannot
8 contain. There's nothing I can do with it." And I
9 said, "Gene knows about it and everybody else up front
10 knows about this gas leak that we have on the CIP." The
11 way it's coming from underneath, it's coming up right
12 there where the big light shines and you can see the gas
13 going up. Not bad, but it looks worser during the
14 nighttime than in the day. In the day, I can't look up
15 there and see. I got to the back away from the gas leak
16 maybe 40 or 50 yards, then I can see the shady spot then
17 I can see, but close to it, (indicating). And then
18 operators come and ride through there on that little
19 mule and they look and take off. To them it's clear,
20 but I can see myself at nighttime. It's totally
21 different. You can see the gas leaks.

22 Q. Okay.

23 A. Right up close. If you go far away, you can be
24 able to tell. Once it gets out the light, you can't see
25 it.



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1 Q. Okay. Do you have any responsibility for
2 reporting these leaks to any environmental people, like
3 DEQ or EPA?

4 A. No, ma'am.

5 Q. That's not your job?

6 A. No, ma'am. I report whatever is wrong to my
7 superintendant. He's the one that makes all of those
8 decisions.

9 Q. Okay.

10 A. He told me whatever we see, "report it to me."
11 Something that's wrong, that you got to fix or whatever,
12 I got to get with him.

13 Q. So he doesn't want you to just pick up the phone
14 and call DEQ if there's a problem?

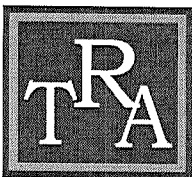
15 A. No, ma'am.

16 Q. And he's told you that, or he made it clear?

17 A. He told me that's his job. He's got to go to
18 DuPont personnel first, from what my understanding is,
19 and I don't have that right to go over him, is what I'm
20 saying, to do stuff like that. I've got to through the
21 chain of command, is what they call it. I got to go to
22 him to do that. I have no right to do that.

23 Q. So you feel like when you report to him, you've
24 done your part?

25 A. That's his job to report it to the front office



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1 and whatever, and he's done it in the past that I
2 reported to him, he went to Gene and Gene come to look
3 at the CIP. We all got together and discussed what we
4 could do, what we can't do or whatever and then go from
5 there.

6 Q. Okay. After you've reported a gas leak or talked
7 about a gas leak to somebody, has there been any
8 conversations with you about whether DEQ was called or
9 not called or who made a decision about that?

10 A. Called out to fix it?

11 Q. No. Whether DEQ was called and told that it was
12 happening.

13 A. I was never involved with DEQ whatsoever.

14 Q. So nobody's talked to you about whether or not
15 they've talked to DEQ; that's just not your job?

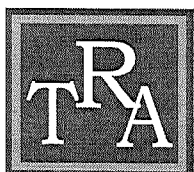
16 A. No, ma'am. I'm there to catch the leak, repair
17 it and keep it on site. That's it.

18 Q. Okay. I think Mr. Cayette was talking about
19 there's a morning meeting at DuPont that --

20 A. Every morning, yes.

21 Q. -- that Mr. Macha goes to.

22 A. I used to go to that, too, and that is to discuss
23 if nobody else is doing the work, if it involves anybody
24 else, not work on top of each other, in other words, to
25 go get their own scheduling. We got our schedule, the



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1 operators got their schedule. If we've got a piece of
2 equipment that we've got to move, like, let's say, a
3 piece of piping that's got to be moved from us to
4 replace a new one, then we have to know that there's
5 nobody in the area working while we're doing that job.
6 So sometimes that morning meeting is for that purpose,
7 for us to change our schedule.

8 Q. Okay. And then some things that are discussed at
9 that meeting might get passed on at that KBR meeting
10 that happens after that?

11 A. No, ma'am.

12 Q. No?

13 A. No, ma'am. KBR's supervisor is Rick. The DuPont
14 operators and the DuPont main office, the general
15 manager there, all of these guys that are in the front
16 office are with us in that meeting.

17 Q. Okay.

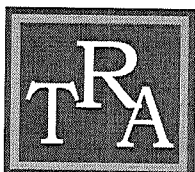
18 A. The safety man, also.

19 Q. Okay. So they don't really have to go back and
20 relate it --

21 A. No, ma'am.

22 Q. -- in another meeting?

23 A. No. We leave from that meeting and we have our
24 own safety meeting, which we do exercises in the
25 morning, every morning, and talk about what job -- one



1 job that we're going to be doing and go through one JSA
2 to be sure everybody's on the same page.

3 Q. So it's that safety meeting that Mr. Cayette must
4 have been talking about that happens at KBR?

5 A. Right. Correct.

6 Q. All right. Do you recall being at a morning
7 meeting or near a morning meeting maybe in entering or
8 leaving or having conversations where Mr. Miller was
9 discouraging people from calling outside authorities, to
10 try to keep it on the plant and deal with the leaks
11 internally? Were you at a meeting like that?

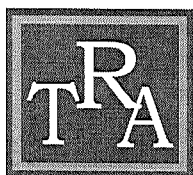
12 A. I've stopped going to the meeting -- it's over
13 eight months for sure -- because of my hearing problems.
14 Okay?

15 Q. Okay.

16 A. And, also, they want to cut back on spending,
17 because when I do that, I've got to come in a half hour
18 early, which is overtime, so they said, "There's no use
19 for you and Mark to be coming in," so they cut the
20 hours.

21 Q. They were paying you to come to a meeting you
22 couldn't hear anyway?

23 A. That's right. I was okay with that, and Gene
24 asked me about that. I said, "No, Gene. That don't
25 both me. Tell everything to Mark and let Mark tell me



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1 in the office." That's the way we're doing it today.

2 Q. Okay. All right. I've heard some testimony
3 about some hard barricade around the process area.

4 A. Yes, ma'am.

5 Q. How long have those been there, would you say?

6 A. Let me see. That's got to be eight months.

7 Q. Do those have anything to do with the leaks?

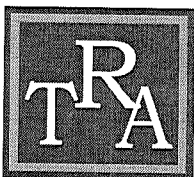
8 A. Yes, ma'am.

9 Q. What do they have to do with the leaks?

10 A. The hoses, the black hoses, they'll be running to
11 the boxes and sometimes we have to have a connection,
12 like I told you about with the wrapping. Well, after
13 the acid goes through there, we have an acid drip, so to
14 protect anybody from going in there and not knowing
15 about the acid leaking that drips, we used to have a
16 soft barricade at one time.

17 Q. Soft?

18 A. Yeah. It's a regular plastic, but that wasn't
19 lasting because people was just coming there and just
20 walking through it and just picking it up and just
21 walking through it, not noticing the danger. And it's
22 on the tag. I'm the one that put yellow tags, "Beware
23 of the acid drips from the hoses," signed my name, KBR.
24 One scaffold builder at one time went in there without
25 permission and went to pick up a piece of scaffold bar



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1 and the acid drip hit his nose right here and burned his
2 nose up. He went to the safety shower and once he went
3 to safety shower -- he did what he's supposed to do.
4 Went to the safety man and told him about the acid leak
5 and that's when they decided -- they got together on
6 that safety meeting and they decided, "Okay. We're
7 going to build a hard barricade there. Since we've got
8 Excel Scaffold here, we're going to ask them if they
9 could put a hard barricade, and nobody's going to be
10 allowed in there except the guys working on the hoses."
11 And that's when DuPont changed that.

12 Q. How long ago was that?

13 A. About eight months, nine months ago.

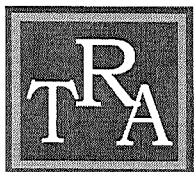
14 Q. Do you remember the guy's name that got the acid
15 drip?

16 A. No. He worked for Excel Scaffold.

17 Q. Okay. What about the gas; is there any little
18 sign on the hard barricade that says, you know, "Watch
19 out for gas," or, "Don't come too close because of the
20 gas leaks"?

21 A. All they had on the doorway was "Tyvek suit
22 required in this area" on the tag that I put. Okay? I
23 put, "Beware of gas leaks and leaking acid out the
24 hose." That's what I put on the tag.

25 Q. Okay. And where does that tag hang? On the hard



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1 barricade?

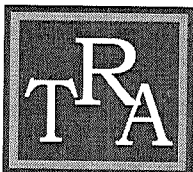
2 A. Yeah.

3 Q. Before the hard barricade, was there anywhere for
4 you to hang a sign like that, or there wasn't a sign
5 like that until there was a hard--

6 A. There was not a sign. The reason the sign was
7 put on was because people was still going in there
8 thinking it was just a regular barricade. A hard
9 barricade is a red barricade, automatic. It doesn't
10 have to be a color. So what they made me do is put a
11 red tape around the barricade to people know that you
12 got to have permission to go in there. It's pretty big.
13 It's around the CIP area and around the converter and
14 the converter border, everywhere we got hoses up in the
15 air, and it's all barricaded. But actually a hard
16 barricade is a red barricade, but they made me put red
17 tape around it to clarify that. They told everybody,
18 all of the supervisors in the plant area, that's what it
19 is. And once that was done, people kept on going
20 through there, so we put a sign on the door saying,
21 "Saranex suit required in this area for working
22 conditions."

23 Q. Okay.

24 A. Then we finally -- my workers stopped complaining
25 about that because of the work we were doing, sometimes



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1 they didn't require a Saranex suit. A Saranex suit is
2 really hot because there's no air going through.

3 Q. No breathing.

4 A. Right, no breathing.

5 And they would rather wear a Tyvek suit, so they
6 finally took the signs off, but they had a meeting in
7 the morning that everybody knows that you still cannot
8 go in there without a Tyvek suit or some type of PPE
9 before you go in that area.

10 Q. Okay. So that hard barricade is doing a pretty
11 good job regarding the acid dripping on people?

12 A. Correct.

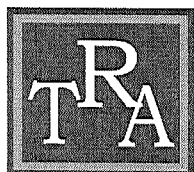
13 Q. It doesn't do anything, though, for the gas that
14 might go past the barricade?

15 A. No, ma'am.

16 Q. Okay.

17 A. After the gas goes off DuPont and whatever, all
18 around and goes in the outer field. Now, don't get me
19 wrong, when you got a thunderstorm that comes around, it
20 come goes down because of cool air or whatever, and at
21 some point in time, we had to get everybody out of spent
22 furnace area because we had Performance Contractors
23 doing some work. They had to come out the area because
24 of the gas of the leaks were affecting them.

25 Q. Okay.



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1 A. Because when we put the box up and the hoses and
2 you got a southwest wind or southeast wind; okay, and
3 then next thing you know, you got a northeast wind, so
4 what that does is that pushes the gas away from the box
5 that you're collecting from and next thing you know, the
6 gas is going off site. You can't control that. You
7 can't wrap the whole converter. And, like I said, like
8 I told Gene, we're doing our best, but once you got your
9 box made and the wind comes from another different
10 direction, the wind gets inside that box and shoves the
11 gas away and pulls out the box, so you got a gas leak.
12 So when they tell me to go and fix it, I say, "Well,
13 wait till the thunderstorm stops and we might be able to
14 see what we can do it with it. Right now, I can't do
15 nothing with it because the wind is just swirling
16 around." That's what happens. Once that little shower
17 or storm goes by, it's back to normal, you don't see no
18 gas. So that's what happening with the CIP, and I tried
19 to explain that to these guys, and they understand some
20 of it, don't get me wrong, but then they say, "We've got
21 to collect it." I said, "I'm doing my best with what I
22 got. I can't do nothing else. That's it."

23 Q. The Performance Contractors that you were talking
24 about, that's the name of the company, Performance?

25 A. Yes.



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1 Q. Okay. And do you recall how they were affected
2 by the gas? Eyes and throat or --

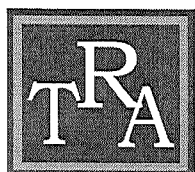
3 A. Yeah. The throat, the breathing part. Okay? If
4 you're not used to today that gas, you'll notice right
5 away. You get an itchy throat, starts coughing right
6 away, you got to get out of there. If you're used to
7 it, like a person like myself, I can walk into it almost
8 and hold my breath and that's all I can do and see what
9 they're talking about. I don't have to go that far. I
10 can actually see the gas rather than going in it. I'm
11 just I'm so used to looking at it. Like I'm saying, if
12 you're not used to it, you won't see it, and you'll walk
13 right into it. If you're used to it, you'll smell it
14 and you'll go the other way. That's for sure.

15 Q. Okay. When you first started learning about the
16 gas or being exposed to it, did it bother your throat at
17 first, too?

18 A. Oh, yes, ma'am, big time.

19 Q. So how did you learn to deal with it? Just by
20 holding your breath?

21 A. I'm going to tell you something, which is a
22 little secret that I have, they got the red or orange
23 wind directory up there that I can see from anywhere in
24 the plant, when I look at that, I know exactly where to
25 go for the gas don't get to me.



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1 Q. Okay. And where is that the orange or red wind
2 direction?

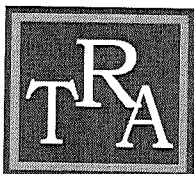
3 A. They got three of them on the highest part of the
4 plant. It's on top on the dry tower. One's on top of
5 the SO3 unit, and we put a new one by the hot house, on
6 the south side of hot house. That's where most of the
7 gas is at, that you can see the direction good.

8 Q. Okay. So tell me, when you see the flags -- and
9 they're like flags, I guess?

10 A. (Witness nodding head).

11 Q. When you see the wind direction flags, how does
12 that affect your behavior or how does that work?

13 A. When I see the orange flags straight toward me
14 and I smell the gas, I'll go cross-wind, circle back
15 around and go find where the gas leak is come from, and
16 then report it, whatever it is. At one time, on the
17 spent furnace itself, there's a hole about this big
18 (indicating) -- that, you can't see. I don't know why.
19 It's molted sulfur in a fume, but it's very, very
20 strong -- and I was walking to the corridor area and all
21 of a sudden, I did this (indicating) and I noticed it,
22 so I backed up. And you can't see it unless you spray
23 ammonia on it. So I got ammonia in my locker for my
24 personal use. So I backed away. I know I'm going to
25 get that sucker, so I went back in my locker and started



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1 spraying, but I couldn't see, so I went underneath the
2 spent furnace, went underneath there and looked up and I
3 could see a hole, and as soon as I sprayed that ammonia,
4 I could see the cloud. I said, "Oh," so I went to Mark
5 and reported it. The next morning, they built a
6 scaffold there with respirators on and I went ahead and
7 repaired the leak. That's how sometimes you catch it.
8 That's not the way you want to catch it, but that's the
9 way I caught it. Very strong gas.

10 Q. Is that SO2 or something stronger than that?

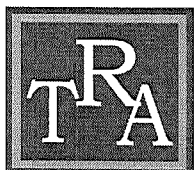
11 A. I would say SO2 because it's molted sulfur that
12 goes to the sulfur furnace, and that's where they got it
13 at, I believe, 1,390 degrees or something. It burns up
14 into a fuming gas, and that's where it goes from there
15 to the sulfur boiler and then the converter boiler and
16 then to the converter. That's where it converts to the
17 acid part.

18 Q. Okay. Has anybody ever taught you anything about
19 reportable quantities or recordable quantities of SO3 or
20 SO2?

21 A. We had classes on that, how much time you can
22 stay in it, is what I'm saying.

23 Q. Like permissible exposure levels for OSHA or
24 something?

25 A. Correct. Parts per million, we had all of that



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1 in a class at DuPont in the conference room, and we are
2 aware of that. On an eight-hour basis, you can be
3 exposed to like maybe two or three hours at the most.

4 Q. And is that SO2?

5 A. SO2. We don't get too much SO3 because that's
6 hot house, but it's still available for leaks, but when
7 we have a leak on SO3, they blow the sirens.

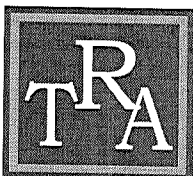
8 Q. They blow the sirens?

9 A. They blow plant siren and we got to report to the
10 rally spot. That happened two weeks ago. Some guy was
11 loading up an SO3 car and something happened to the hose
12 or something and the gas came out and they blew the
13 siren and everybody was taken care of.

14 Q. Okay. The gas clouds that you can see that we
15 talked about earlier, these are SO3 because you can see
16 it; right?

17 A. It -- I would say -- I'm not sure about that,
18 about the HIP area. I believe that's SO3. I'm not
19 quite sure, but everything else below that is SO2 gas.
20 That's coming from the sulfur furnace. The converter is
21 SO2 gas for sure. SO3 gas would be like after the
22 converter, I would say, once it turns into a fuming gas,
23 fuming acid.

24 Q. Do you think Percy Bell knows a lot about where
25 in the operations the SO2 --



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1 A. Oh, yeah.

2 Q. -- and the SO3 is?

3 A. Yes, ma'am. He's -- I've been working with Percy
4 Bell quite a few years. He's the operator. He's the
5 one that signs all of the permits and everything. He
6 knows the system very good.

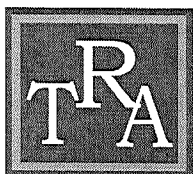
7 Q. Okay. And he -- I don't remember, I can't tell
8 you everything he said right now, but he went through
9 the different equipment and which one would have SO3 and
10 which one he thought would be leaking SO2, so whatever
11 he said, would you go along with that, or would you have
12 a reason to dispute what he said?

13 A. No. I have to go along with what he says. He's
14 more knowledgeable on the plant system than I am.

15 Q. Okay. All right. Would you say the larger an
16 SO3 gas leak is, the more visible it is?

17 A. Oh, yes, ma'am. It multiplies like 10 times the
18 amount coming once it hits the atmosphere, it multiplies
19 into a huge cloud. It can be a small leak about that
20 big (indicating), a little bitty hole, and it will be
21 15, 20-feet wide, I'd say, because that's what happened
22 on that tank car. Once it leaks a big hole, we have a
23 major problem.

24 Q. Okay. I'm going to ask you some questions about
25 paperwork.



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1 A. Okay.

2 Q. The work orders for DuPont Burnside, do you keep
3 any copies of those or is that DuPont document? Is
4 there anything called a work order that you're familiar
5 with?

6 A. Work order number?

7 Q. Yeah.

8 A. Mark Macha keeps that. He's got that in his
9 folders. All what charges, the documents to charge to
10 what job and all that? Yeah. We got like a gas repair
11 number, boiler numbers, spent furnace number, all of the
12 vessels in the plant that we deal with that we work on
13 got a different number.

14 Q. And is there a file or something where they
15 keep -- where KBR keeps the work orders, a copy of them?

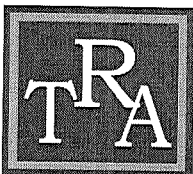
16 A. Mark Macha has that.

17 Q. And is that like in his desk, so if he's not
18 there, you use it or --

19 A. No. It's in his desk. It's in the file cabinet.

20 Q. Okay. And I guess they use the work orders to
21 prepare the bills to DuPont, or do you know anything
22 about that?

23 A. No, ma'am. That's to keep track of what work we
24 do on what vessel, and that's all sent to Wendy. It's
25 on the timesheets also. They put the job number on the



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1 timesheets, they put how many hours we work on that job.
2 If it's gas leaks or it's whatever we work on, they got
3 number for it.

4 Q. Okay. Who writes the work order, DuPont, or who
5 writes that?

6 A. To...

7 Q. For gas leaks.

8 A. The work on the gas leaks or to what?

9 Q. Whatever document is called a work order. Is
10 that a DuPont work order?

11 A. Huh-uh. The number that -- the charge code is
12 DuPont. I'm not sure, but they give it to Mark.

13 Q. Okay.

14 A. It's called a coordinator, the job coordinator,
15 which I forgot his name, but that's who does that. That
16 may be Don Benege (sic), if I'm not mistaken.

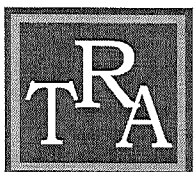
17 Q. Now, is that's for KBR or DuPont?

18 A. That's a KBR man that worked for DuPont that
19 transferred his stuff to KBR. He's like the middle guy.
20 He gave those work orders to Mark to put in the
21 timesheet.

22 Q. And then Mark sends the work orders to Wendy at
23 Pontchartrain?

24 A. Yeah, off the timesheet.

25 Q. Okay.



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1 A. The work orders are on the timesheet to charge up
2 so many hours to that job, and that's send to Wendy
3 Jenevies at Pontchartrain.

4 Q. All right. Does anybody keep track of the amount
5 of hose that y'all are using, like the black hose and
6 the stainless steel hose or PVC pipe that y'all are
7 using for these gas leaks?

8 A. All I can tell you is that we order that from the
9 warehouse, which is controlled by Hagemeyer.

10 Q. What's that name?

11 A. Hagemeyer.

12 Q. Haga...

13 A. H-A-G-E-R-M-E-R-S (sic).

14 Q. H-A-G?

15 A. E-R-M-E-R-S, I believe. Hagemeyer.

16 MR. SIMONEAUX:

17 Something like that.

18 THE WITNESS:

19 Maybe if he said it, you can hear it.

20 MS. BARNEY:

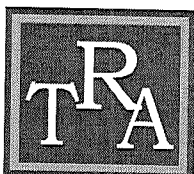
21 He's not allowed...

22 BY MS. BARNEY:

23 Q. So Hagemeyer?

24 A. Hagemeyer; correct.

25 Q. That's a contract or a supply house or what?



1 A. They take care of the store. That's their job,
2 whatever we want to order, we go through him, and we
3 order what we need. Now, not everybody's got the right
4 to order. Only supervision.

5 Q. Okay.

6 A. Like myself, if I need black hose or metal hose,
7 I go, "Get me two hoses, I need it for next week," or I
8 tell Mark to order some. That's the only way we get it.

9 Q. So only you and Mark Macha --

10 A. Correct.

11 Q. -- can order the supplies to fix the gas leaks?

12 A. To KBR; correct.

13 Q. Okay. Who at Hagemeyer is the person --

14 A. Derek Anderson.

15 Q. Derek Anderson?

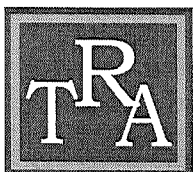
16 A. At Burnside, yeah.

17 Q. Okay. And he's actually in the store room?

18 A. Yes, ma'am. He's the one that runs the store
19 room. He's the only one there for Hagemeyer.

20 Q. All right. So when you place an order, is this
21 stuff that you want already in the store room, or are
22 you asking him to go get it and put it in the store
23 room?

24 A. If it's not in the storeroom, he's got to get a
25 work order number from Don Benege to get it ordered.



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1 He's got to have a work order number to put on it.

2 Q. Okay. So that's that same work order information
3 that would be in Mark Macha's file?

4 A. Yeah, that's correct.

5 Q. Okay.

6 A. Sometimes Mark will tell them give them the
7 number what to put it on.

8 Q. Do you know what quantities this black hose comes
9 in, like how many feet?

10 A. I would say 500-foot roll. It's a black roll all
11 together. All together, 500 feet.

12 Q. About how many of those would you say you have to
13 obtain?

14 A. Two rolls I have to keep on site.

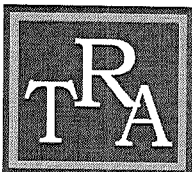
15 Q. At all times, pretty much just keep them
16 available?

17 A. No less than one roll. That's what they told me,
18 keep one roll on site at all times.

19 Q. Okay.

20 A. And the metal hoses, like three sections, three
21 rolls of 24 feet. It's on one pallet, and I've got to
22 have at least one pallet on site at all times.

23 Q. All right. Do you have any idea about how long
24 it takes you to go through one 500-foot roll of the
25 black --



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1 A. If I'm the only one there all of the time
2 changing the hoses and knowing how much they take off,
3 we take a bunch off. Because of the color, I guess, and
4 the sun right now, we change out -- pretty much we're
5 taking care of that, so I would say maybe 150, 200 feet
6 almost every two weeks. The metal hose is getting
7 worse. I'm talking about a 24-foot piece of hose, four
8 days, we have to change it out. That's how bad it is,
9 the leak.

10 Q. Okay. And has the storeroom situation with the
11 orders going through Derek Anderson, has that been the
12 situation for the last two years, the way you got your
13 hoses and your materials?

14 A. Yeah, I'd say the last two years we've been
15 dealing with that.

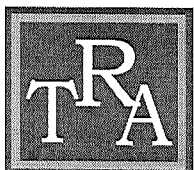
16 Q. In other words, you haven't just started getting
17 your supplies that way in the last year?

18 A. Oh, no, ma'am.

19 Q. It's been like that the whole time?

20 A. Right. We've been on the black hose, I would
21 say, three years now, but as matters have gotten worse,
22 we've been getting more is what I'm saying.

23 Q. Okay. Do y'all at KBR have any pictures or video
24 of the leaks that you use maybe to train your guys or to
25 for any other purpose in your job?



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1 A. Video for what now?

2 Q. Of the leaks, like maybe film from those cameras
3 on the stack or --

4 A. Oh, no, ma'am, no.

5 Q. Y'all don't have any --

6 A. No.

7 Q. Y'all don't have access to that film?

8 A. No, ma'am. We don't have access to the camera.
9 That's at the control room right there.

10 Q. Okay. Do you know whether or not Mark Macha ever
11 asked DuPont if he could, you know, use that video to
12 train the guys or to show you what's going on?

13 A. Huh-uh. No, ma'am.

14 Q. Okay. Are you aware of an incident report
15 procedure that DuPont has on the DuPont side?

16 A. Yes, ma'am.

17 Q. Okay. Do you have to do anything in connection
18 with that process?

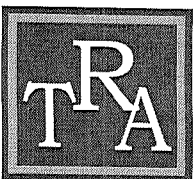
19 A. If it's concerning to my employees, as far as
20 that concern, I got to look at that situation and see
21 how can I make it better.

22 Q. Okay.

23 A. Like, let's say, wasp sting, which is everywhere.

24 Q. I'm sorry. What was that?

25 A. Wasp sting.



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1 Q. Oh, wasp sting.

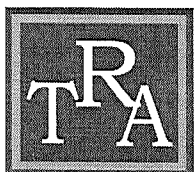
2 A. We go in the back and we've got some old wooden
3 palettes that have been there laying for months there,
4 and I tell the guys, "Look, be aware of the wasps. They
5 got some in there." I say, "You don't have to move
6 nothing. This is what you got to look for." Make them
7 aware of what their surroundings are as far as that's
8 concerned, and we had a whole bunch of those incidents
9 happen. Matter of fact, myself, I was working right by
10 bushes of flowers, and it stung me on the arm that fast,
11 so...

12 And if I'm not thinking where I'm going, that's
13 where they at right there. They all over, especially
14 pipe racks where you got a lot of heat. They all over
15 the place, so I try to do away with that, so that's most
16 of the time where I get involved into investigations.
17 If it's one of my guys that -- the safety man does the
18 investigation, why it happened, when it happened, all of
19 that, then he gets back with me and gives me that
20 information, "So let's not let it happen again." Bottom
21 line.

22 Q. Okay. All right. Do you have to get involved in
23 any incident reports with regard to gas leaks at DuPont?

24 A. No, ma'am.

25 Q. Do you have to do any incident reports on your



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1 side with KBR, like the times you have to hold your
2 breath and walk the other way or anything like that? Do
3 you have to write up an incident report every time that
4 happened?

5 A. The only time I would have to write up an
6 incident report on my behalf is when I get called out on
7 weekends and I'm the only one there and one of my guys
8 were to actually get hurt, I would have to write up an
9 incident investigation on that. Besides that, I report
10 it to safety man, which he will come and take it over,
11 or Mark Macha, and he'll take care of that for me.

12 Q. All right. So when it comes to kind of the gas
13 floating around, nobody treats that as like an injury
14 and goes and gets an incident reports and writes it up?

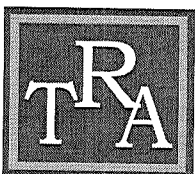
15 A. No, not maintenance people.

16 Q. Okay.

17 A. And I've never known nobody to -- the other
18 contractors, because they make them aware of that when
19 they, say, go to orientation. When the new guys come on
20 the plant, they go to orientation and they're notified
21 about those gas leaks and in this area of the plant
22 where you should be or where you shouldn't be, so they
23 know about it already.

24 Q. Do they tell them about the flags?

25 A. Yeah, they're told about the flags. Most of the



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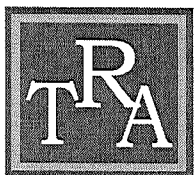
1 time. I know where the flag is at.

2 Q. Okay.

3 A. That I look at all of the time.

4 Q. Okay. Were you at there the time Leo Scott got
5 in the gas, or did you hear about Leo Scott breathing in
6 the gas?

7 A. If I'm not mistaken, I believe that was at 5 and
8 6 rack that he got some. That's from the leak that --
9 like I said, most of the time, the gas, the wind
10 direction comes from the southeast, and southeast wind
11 goes straight to the 5 and 6 rack where they are mostly
12 there most of the day. Okay? They're aware of the gas
13 leak. Now, did he get too much of it or whatever, I'm
14 not sure the whole story about that, but I know he was
15 riding around in a truck with a respirator on with the
16 windows up, and everybody thought he was crazy. I said,
17 "Well, maybe he's smelling gas that we're not smelling."
18 Because I told them, I told my guys, when I first come
19 to this plant, it was rough for me to get started
20 because I couldn't hardly breathe at times going to
21 different places. Wind direction plays a lot to do with
22 that. If you stay upwind of the gas -- most of time
23 when I go to the control room, I go southeast or
24 southwest, south, and the flag's going that way, I'm not
25 going to cross if I don't have to. That's me. Some of



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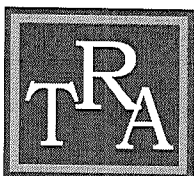
1 the guys, they're not aware of that. They know about
2 it, but they just ignore it, and then the next thing you
3 know, you sniffing that gas. Especially in a man lift,
4 when it takes time to get down, you got to hurry up, you
5 got to get out of there.

6 Q. Okay. Do you know of any employees other than
7 Leo who took a sniff of it as you mentioned and kind of
8 learned the hard way?

9 A. I had one employ way back then. His name was
10 Sterling Melancon, and he worked for me. He was in a
11 man lift repairing a gas leak on the sulfur furnace,
12 crossed over a duct that goes to the sulfur boiler, and
13 he was making a weld repair. He had a little bitty pin
14 hole, not bad of a leak, but, actually, he was in the
15 man lift about four feet high, and we he started welding
16 on it to try to cover a pin hole, a big ol' chunk of
17 metal blew out about this big (indicating), hit him on
18 the chest and in the face and he didn't have no PPE on.
19 This was 15 years ago. He actually climbed over the man
20 lift and walked on the boom all of the way to the bottom
21 end, jumped of and ran to the shop.

22 Q. Wow.

23 A. And he was choked. He was out of breath. Now,
24 like I said, maybe from running or, you know -- he did
25 the right thing. You either stay in that man lift and



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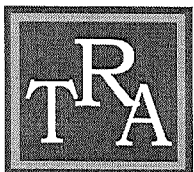
1 suffocate or jump out. Well, I would have jumped out
2 myself. That's what I told him. But, again, your JSAs
3 that we fill out covers all of that now. You got to
4 look for the unexpected, and in his part, I guess -- I'm
5 a qualified pipefitter, I might have done the same thing
6 myself not knowing. But, again, that's where you learn,
7 from the inside. Once they took off that duct for
8 repair, I looked at the inside, and it was ate out from
9 two or three feet away in little ripples going all of
10 the way up to nothing. So if you weld on that, it's
11 going to blow up. So our thing now, from now on, you
12 cannot weld on a gas leak unless you get a plate one
13 foot by one foot wide. That's the least you can have.

14 Q. So you took a one foot by one foot piece of metal
15 to put over a leak no matter how big the leak is?

16 A. Correct. That's minimum you can put. That's
17 what we go by right now.

18 Q. And that keeps you welding like a foot -- you
19 know, a big square around the hole?

20 A. And, again, you measure with a tape measure one
21 foot, and you put the weld first. You don't put the
22 plate. You measure that and you weld before you put the
23 plate on to make sure you ain't going to pull through,
24 and you got to have your PPE on to do that, because of
25 that incident right there?



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1 Q. So in terms of just walking around the plant, you
2 know how you've described knowing not to cross in
3 certain areas and watching the flags the way the wind's
4 blowing and that sort of thing, and I think Mr. Bell
5 testified kind of the same way.

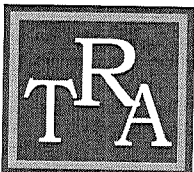
6 A. Yeah.

7 Q. With regard to that situation, are there guys
8 with less experience that you know of who have kind of
9 gotten in the gas a little bit and learned what you've
10 learned about how not to get in the gas and how to walk
11 a different way?

12 A. Sometimes it's depends on the working area, where
13 you go with your permit, and sometimes I can't help
14 that, but I can't keep everybody upwind. Okay? I got
15 to put them where the job is to get it done. It's got
16 to get done, so I make them aware, when you fill out the
17 JSA, make sure you put the wind direction on there. Be
18 aware, that in case something happens, you know exactly
19 where to go. Okay? You just can't stay there for five
20 seconds and determine, "Hey, where I'm at? Where I got
21 to go?" Then it's too late. You got to do that before
22 it happens, so that's what I try to preach them about.

23 Q. Okay. Just so we have an example of it, I'll
24 attach pages 13 through 15 KBR as Exhibit 1.

25 (Whereupon a document is marked for



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1 identification as Exhibit Number 1.)

2 THE WITNESS:

3 See wind direction right here?

4 BY MS. BARNEY:

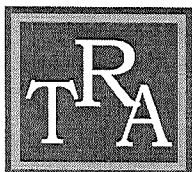
5 Q. So on page KBR 13, you actually write the wind
6 direction, or somebody writes it on that sheet?

7 A. Right. The person who is doing the job evaluates
8 the working area and he puts that on there. So he's
9 aware of where the wind is coming from.

10 Q. And that's so they can try to avoid being
11 downwind of the gas leak?

12 A. Correct. If you're on a job site, you know
13 exactly if you're downwind or if you're upwind. If
14 you're upwind, you're in good shape. Most days at the
15 converter, you're downwind of it, especially the first
16 pass. On the fourth pass, you're upwind of it, and it
17 makes a big difference. First pass is on the north
18 side. The fourth pass is on the south side, so if
19 you're in a southeast wind and you're on the fourth
20 pass, you're good. You don't got to worry about the
21 wind -- I mean, the gas. It's going toward 5 and 6
22 rack, which is north. So my guys are aware of that. My
23 guys work in all of that. They're pretty good.

24 Q. Okay. Do you ever get any e-mails about the gas
25 leaks or what work you need to do on the gas leaks?



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1 A. I got e-mails on the incident reports that I get,
2 and I take them and I save them.

3 Q. Okay.

4 A. I put them in the save box, but that's about it;
5 but, no, not on gas leaks.

6 Q. Okay. Are there formal inspections of the
7 converters, the HIP or the CIP or the superheater, are
8 there any like formal inspections that you know of?

9 A. Not that I know of.

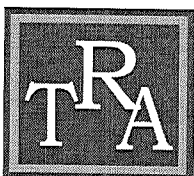
10 Q. Nobody comes down from like DuPont in Delaware to
11 inspect the equipment or --

12 A. They come down -- I've seen -- now, I don't know
13 what they were doing there. I saw a bunch of guys
14 around the CIP and the HIP area on the road side just
15 looking at it.

16 Q. On the road side, but in the plant?

17 A. It's in the plant, but it's not in the working
18 area, is what I'm saying. You got a road that goes all
19 around there. They're on the road standing up looking
20 at the HIP and the CIP, which is about 20 yards away
21 from where you can actually touch it at, see what I'm
22 saying? So I don't know what they were discussing. Tom
23 Miller was with them, George Valentine and a couple
24 other guys, so...

25 Q. About how long ago was that, would you say?



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1 A. That was last week, and I guess it's related to
2 the shutdown which is coming up. I don't know. I don't
3 know if they were outside operators, outside contractor
4 or DuPont people. I have no idea.

5 Q. Earlier you mentioned that there was an
6 engineering guy at Burnside who got transferred or
7 something, that he had kind of come up with a schedule
8 to check the hoses on Monday through Thursdays. Was
9 that Lewis Chew? Is that the guy you were referring to?

10 A. I know when we was talking about it. The only
11 time I worked with Lewis was inside the spent at the
12 storage tank on inspection. That's the only time I
13 worked with that man.

14 Q. So you never worked with him in connection with
15 the gas leaks?

16 A. No, ma'am.

17 Q. Okay. All right. Could it have been Kirk Bailey
18 that you were thinking of?

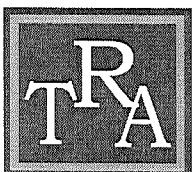
19 A. That's...

20 Q. Thank you.

21 A. I'm sorry. That's him.

22 Q. Okay.

23 A. He's the one that came up with the schedule that
24 we're going to work Monday, we're going to check it
25 Monday and we're going to check it Thursday, not wait



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1 until something happens. It's Kirk Bailey; right.

2 Q. All right. Okay. He used to have Gene's job;
3 right, Gene Clemens?

4 A. Correct. He's over maintenance.

5 Q. Okay. I'm getting close to wrapping up,
6 Mr. Blanchard. Thank you for your patience.

7 A. No problem.

8 Q. Okay. We were talking a little bit about the
9 quantity issue, and then we might have gotten
10 sidetracked. I just want to be sure I understand.
11 Nobody has told you anything about the quantities that
12 you have to keep track of that are coming out of the
13 vessels that are leaking?

14 A. No, ma'am.

15 Q. Okay. Nobody said, "If it looks like this, that
16 means it's 100 pounds." "If it looks like that, that
17 means it's this amount of volume"?

18 A. No, ma'am. We don't discuss quantity at all.
19 All we're doing is to collect it.

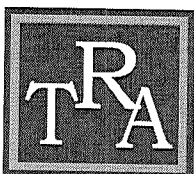
20 Q. The best you can?

21 A. That's it.

22 Q. Okay. And I can't remember if I've already asked
23 you this because I've done a couple of depositions now.

24 A. Okay.

25 Q. Have you given any tours to any DEQ people that



1 have got come out to the site for any reason? You've
2 never taken a DEQ person out to the processing area?

3 A. No, ma'am.

4 Q. Do you know if anybody has ever taken a DEQ
5 person out to the process area?

6 A. A DEQ person?

7 Q. Yes.

8 A. Huh-uh.

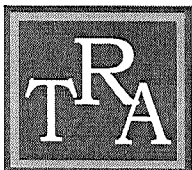
9 Q. Okay. Did you hear of anything about an audit by
10 DEQ where they came out one night and went to the
11 control room?

12 A. I've heard something about the wanted to shut
13 Highway 44 down, and the law officers went to the
14 control room, but that's all I know of. I don't know no
15 more. I guess nobody wanted to talk about it, so I
16 didn't hear nothing. I don't go digging for information
17 that I don't need, so I left it alone.

18 Q. But nobody brought the DEQ people to talk to you?

19 A. No, ma'am.

20 Q. Okay. All right. Well, I believe Mr. Cayette
21 had testified about training films that he had watched,
22 and there was some questions about whether those
23 training films included actual DuPont equipment on the
24 film or whether it was just sort of a general training
25 film. Do you know what the training --



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1 A. The training?

2 Q. Yeah, training film.

3 A. Training, it's like a Hazmat training, like for
4 keeping whatever we make -- the first thing you have to
5 do is contain it. Number one, don't let it go off site,
6 that's liquid gas, whatever, and that's what we go to is
7 training. Hazmat training, they call it.

8 Q. Okay. All right.

9 A. And everybody on the plant site goes to that
10 training. My helpers, everybody.

11 Q. So I guess it sounds like the leaks in the
12 process area that we've been talking about are
13 significant enough to keep you guys busy on just about a
14 full-time basis; is that right?

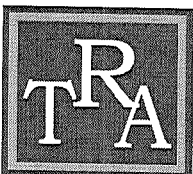
15 A. Keep us where?

16 Q. Busy. I'm sorry. I'm not talking loud enough.

17 A. Oh, man, yeah.

18 Q. Yeah?

19 A. We work on it, on Monday, we get most of it under
20 control, but by Thursday, it's like almost at the same
21 place that we started, so it's going -- it's a relapse
22 over and over and over again, and what they're telling
23 us that, "We know y'all are frustrated, we know, but you
24 got to keep on doing this for two more weeks until the
25 shutdown," so that's what we've been fighting.



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1 Q. All right.

2 MS. BARNEY:

3 I think that's all I have for right now,
4 Mr. Blanchard. I'm sure Ms. Wiener has some questions.
5 I might have a few more, but hopefully we're getting
6 close.

7 THE WITNESS:

8 Thank you.

9 EXAMINATION BY MS. WEINER:

10 Q. I'm Monique Weiner. I represent DuPont, so I
11 just have a couple follow-up questions for you.

12 You said that there's about 24 leaks that you've
13 identified or worked on or your crew has worked on?

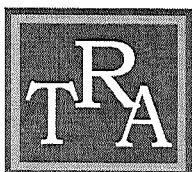
14 A. Twenty-four Ts in the line that I'm collecting
15 gas from right now.

16 Q. Okay. And that's different from cracks or --

17 A. Yes, ma'am. That's different holes, the
18 converter boiler and you got the converter first pass,
19 converter second pass, third pass, fourth pass, the HIP
20 and CIP. That's everywhere the leaks at that I'm
21 collecting.

22 Q. Right. Is there any way as you sit here today to
23 tell us how many leaks your crew has worked on, like
24 cracks in the equipment or holes in the --

25 A. The last time we did the this?



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1 Q. How many total times, how many cracks or leaks
2 there have been, are you able to say, or they're just
3 ongoing, so you can't really say?

4 A. I don't know about that.

5 Q. Okay. Have you ever seen personally the cracks
6 or holes in the CIP or the HIP or the converter?

7 A. I seen one of them that we discovered on the HIP,
8 yes, ma'am.

9 Q. Okay. Can you describe how big it was?

10 A. It was about eight inches long, quarter inch
11 wide. It was like pulled away from the main -- from the
12 structural part.

13 Q. That's the only one you've ever personally seen?

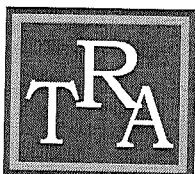
14 A. Well, on the HIP. On the converter, under the
15 insulation, and one of them, the first pass was on a
16 weld. The weld had a hairline crack. It's actually
17 picked up from the metal, so gas was just coming out
18 from underneath, so we had to weld that.

19 Q. How big was that?

20 A. That's about eight inches long and no more than a
21 16th of an inch wide, I would say.

22 Q. All right. Any other cracks that you've
23 personally seen?

24 A. I've seen them -- I've seen gas come out a couple
25 years ago on the converter boiler. We have what's



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1 called custom plates that we put between the expansion
2 joints. We closed it in with a plate because the plate
3 inside was too weak to weld on it, so we put a plate
4 outside and welded it solid, but now the leak is coming
5 out from the weld that we made on the plate, and that's
6 one of them that's -- and what they do is they
7 re-insulate that after, so the gas is coming out and
8 insulation everywhere, so we put the hose exactly where
9 we think the gas is coming from and we're collecting the
10 gas. The last time we shut down, we had too many gas
11 leaks to fix, so we concentrated on the worst one, which
12 the first pass of the converter, and that's the one that
13 they welded on and fixed.

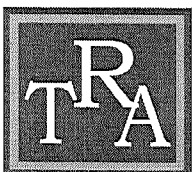
14 Q. Okay. You mentioned that given the nature of the
15 chemical, a very small amount will react and make a big,
16 visual plume that you can see; right?

17 A. That's SO3; correct.

18 Q. Given what you know of that, that a very small
19 amount will make a big plume, are you able to say that
20 any of these releases have been less than a gallon, more
21 than a gallon, more than a pound?

22 A. The only one that was SO3 that I can recall is
23 the one that happened two weeks ago on the tank car
24 loading rack.

25 Q. That's the only SO3 release you've ever seen?



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1 MS. BARNEY:

2 Objection. Asked and answered.

3 BY MS. WEINER:

4 Q. These other smaller ones that you're talking
5 about, at the converter, the HIP and CIP --

6 A. I think that's SO₂, from my understanding.
7 That's not SO₃, but if it is, we see the gas and the
8 insulation, but we cannot tell where it's coming from
9 because the CIP is not made like the HIP. It's not
10 engineered the same way.

11 Q. Right. Okay. So the majority of the leaks that
12 your crew is working on, do you believe those are SO₂?

13 A. That's SO₂; correct. That's at the converter.

14 Q. Are you able to see, just given what you know of
15 how SO₂ reacts in the atmosphere, "I think it's a
16 10-pound release," "a five pound release," is that
17 possible for you to do?

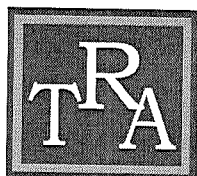
18 A. Yes, ma'am. It's not as bad as SO₃.

19 Q. All right. If you had to quantify what you
20 thought in an hour timeframe those releases would be,
21 what do you think that the pounds of the SO₂ releases
22 would be in an hour?

23 MS. BARNEY:

24 Objection. Lack of foundation.

25 THE WITNESS:



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1 An hour?

2 MS. WEINER:

3 Yes, just to put a timeframe on it.

4 MS. BARNEY:

5 You want him to quantify the amount
6 being released?

7 MS. WEINER:

8 If you know.

9 MS. BARNEY:

10 He's already testified --

11 THE WITNESS:

12 I don't know quantity in that form.

13 BY MS. WEINER:

14 Q. Right. And the only reason I was asking is
15 because you had talked about the little amounts and what
16 the reaction would be --

17 A. Right, but what I'm seeing is what I'm saying.

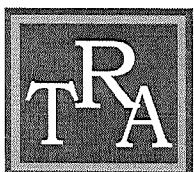
18 Q. Exactly.

19 A. But the amount, I have no way of saying how much
20 it is.

21 Q. Okay.

22 A. It's much bigger sometimes when the hose
23 collapses than when the hose is actually sucking the
24 gas.

25 Q. Right.



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1 How big are the drums that the acid collects in?
2 You mentioned that there's, you know, these funnels so
3 that the hoses don't get worn out as much, they're
4 draining them into a drum, but then they remove --

5 A. Right. We drain them and we put it back to
6 collect the rest of the liquid.

7 Q. What's the volume of those drums?

8 A. Fifty-five-gallon drums.

9 Q. Fifty-five-gallon drums.

10 And how often do those get changed out?

11 A. Once a week.

12 Q. Are they filled up all the way to the top, or do
13 they only let them get --

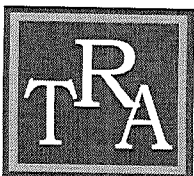
14 A. Depending on the weather, also. They're not
15 covered. If it's raining, we have to dump them more
16 often because the rain sits in there.

17 Q. Sure.

18 A. Okay? Not raining, every once a week, I'd say,
19 and it's not -- we don't wait until they get full
20 because it's too hard to handle. I'd say about half
21 full, maybe a little bit more, and then we dump them in
22 the waste collection pit.

23 Q. So I want to make sure I understood. To get them
24 about half full, the 55-gallon drum half full --

25 A. Correct, maybe 25 --



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1 Q. -- would take about how long?

2 A. About four days, four to five days.

3 Q. Okay. And that's running continuously 24 hours a
4 day, seven days a week?

5 A. Right.

6 Q. The entire time that you've worked at a DuPont
7 facility has been at the Burnside location; right?

8 A. Yes, ma'am.

9 Q. You've never worked at LaPlace or another
10 facility?

11 A. No, ma'am. I've been to LaPlace for schooling,
12 for training, for all of this kind of stuff, you know
13 what I'm talking about?

14 Q. Right.

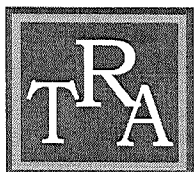
15 A. Testing and stuff, we go over there, but
16 working-wise, it's DuPont Burnside. That's the only
17 one.

18 Q. Right. Got you.

19 In answering some of Ms. Barney's questions, you
20 said that you felt like some of the releases from the
21 converter, the HIP and the CIP had gone off site; is
22 that right?

23 A. Yes, ma'am.

24 Q. All right. How many times do you believe that
25 there have been releases that have gone off site?



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1 A. Some in the air? About five times, I would say,
2 at the most.

3 Q. All right. Do you know how far -- what's the
4 farthest it's gone off site in those five times?

5 A. About like to the levee that I've seen. From
6 what I was looking at, it's like right over the levee,
7 the Mississippi River, on the west side.

8 Q. And you said the levee is the shortest distance
9 where it can go off site from the plant?

10 A. Yeah.

11 Q. Okay. Has anybody, as far as you know, anybody
12 off site, ever complained of any physical problems
13 because of the gas going off site?

14 A. No, not that I know of.

15 Q. All right. Any property issues, like cars being
16 impacted or anything like that?

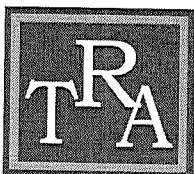
17 A. No, ma'am.

18 Q. And I think we've already covered that you don't
19 know what reportable quantity is that DuPont would have
20 to call in and say, "We've had a release because we
21 think we've exceeded the reportable quantity"?

22 A. I have no idea what that is.

23 Q. That's you not your area of responsibility?

24 A. No, ma'am. My responsibility is to collect the
25 gas and put it back into the plant system.



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1 Q. You mentioned that the leaks are easier to see at
2 night.

3 A. When they're in the light. We've got them big
4 ol' 50-foot light bulbs that shines on the unit, and if
5 the gas passes in front of that, you can see it good.

6 Q. Right. So they're easier to observe, but as far
7 as you know, there's not more gas being released at
8 night as opposed to --

9 A. Oh, no, ma'am.

10 Q. -- what's coming out in the day? It's the same
11 amount --

12 A. It's the same gas leak. It's not more, but at
13 night, you can see it better in some places.

14 Q. Okay. You were asked some questions about the
15 forms and we attached one.

16 A. The JSA.

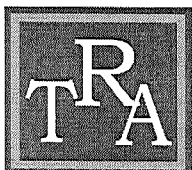
17 Q. Right. And you mentioned about putting a wind
18 direction on that form.

19 A. Yeah, right here (indicating).

20 Q. Right. And the wind direction, that's always
21 been on that form. That's not unique just to these gas
22 releases. They want the employees to always be aware of
23 the where the wind's blowing; right?

24 A. Yes, ma'am, every time you fill out a JSA.

25 Q. And I think it's -- well, you actually can see



1 it. This form was created April 22nd, 2010 at the top
2 of the form; right?

3 A. Yes.

4 Q. And I think when you looked through those
5 maintenance records, that's before they started having
6 problems with these leaks?

7 A. I would say, yeah.

8 Q. So just as a matter of general safety principal
9 at the plant, they want the workers there to understand
10 where the winds's coming from in the event of any kind
11 of release; right?

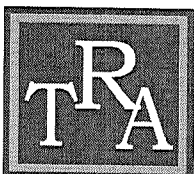
12 A. This was just updated. We've been using these
13 JSAs for as long as I've been there, but KBR, when we
14 went to KBR from BE&K, this is contract. This is not
15 DuPont, but it said DuPont contractor, but they got
16 together and reviewed all of the JSAs and made one new
17 one, so that's just 2010.

18 Q. Got you.

19 A. But all of the other ones had the same thing
20 almost.

21 Q. Okay. Thank you.

22 Now, I know you said you're very familiar with
23 how the leaks look and you're aware of the wind
24 direction. Do you believe that the workers that you
25 have there working on the leaks are as able as you are



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1 to work safely out there?

2 A. Yes, ma'am, they do work safely on gas leaks.

3 Q. Okay. And knowing what you know about gas leaks,
4 do you have concerns that you believe the DuPont
5 Burnside plant is impacting the community surrounding it
6 because of these gas leaks?

7 A. I would say no as far as the community. It's not
8 going that far, but it's affecting the people working in
9 the unit itself is what I'm saying.

10 Q. It makes it hard for you guys to do your work,
11 like you were talking about.

12 A. Right. The new contractors and stuff, that's --
13 as far as outside, I don't see no problem because I
14 don't believe it's going across the river going to
15 Leesville or going back this way to Zachary because it's
16 got too much of a long way to get way out there.

17 Q. All right.

18 MS. WEINER:

19 Mr. Blanchard, thank you for your time.
20 I think that's all I have. She still may have few more.

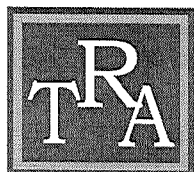
21 THE WITNESS:

22 Thank you, ma'am.

23 MS. BARNEY:

24 Just a couple.

25 RE-EXAMINATION BY MS. BARNEY:



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1 Q. Did somebody at DuPont tell you or lead you to
2 believe that was SO2 coming out of all of these leaks
3 that you and your guys have been working on?

4 A. My understanding, the way the plant operates, as
5 far as changing from molted sulfur to acid, it'd be SO2
6 gas.

7 Q. So you think -- that's your impression?

8 A. That's my impression. I'm not sure about
9 knowledge on that. I have to go get with Percy Bell,
10 and I can come back and let you know.

11 Q. Okay. Has anybody trained you on what the
12 different -- what it looks like when you see an SO2 leak
13 versus when you see an SO3 leak?

14 A. I've seen it. I know what SO3 is on the loading
15 rack, and I've seen the leak already. It's a brighter,
16 much clearer gas than SO2 gas.

17 Q. Okay.

18 A. It's a brighter blue, and you can see it real
19 good. It's very visible compared to SO2 gas.

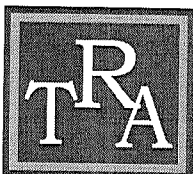
20 Q. Okay. Sometimes can you have a gas cloud that's
21 got both SO2 and SO3 in it; do you know?

22 A. A mixture of both?

23 Q. Yes. Or do you know?

24 A. I don't know that question. I'm sorry.

25 Q. No, that's okay.



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1 Has anybody trained you on the difference between
2 what an SO2 gas leak looks like and an SO3 gas leak?

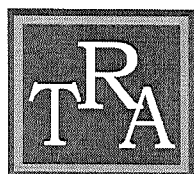
3 A. No, ma'am. I know where SO3 is worked on. We
4 can't go in that area. We can't work -- that's why I
5 know, and I was told to DuPont operators, maintenance
6 people, that it's SO3 in there. That it's a tank inside
7 that hot house. That's why they ran that fume line,
8 that 12-inch, in case something happened in there, all
9 they got to do is open up the valve, it will take care
10 of that gas and put it back into the system. Because he
11 told me, if any kind of leak goes out that big tank,
12 they got to have that suction hose, that suction line,
13 big time.

14 Q. Okay. So as you sit here today, nobody's really
15 told you if SO3 is coming out of the vessels that y'all
16 where working on on a daily basis?

17 A. On the converter or the CIP or the HIP?

18 Q. Any of those.

19 A. Looking at it; okay, I would say that it would be
20 SO2 gas because it's the same thing from the HIP and the
21 CIP to converter, and I've worked on the converter
22 boiler, which is on the other side of the converter
23 coming out sulfur furnace, which that's where the molted
24 sulfur goes into, and I believe that's SO2 gas until it
25 gets to be put back in the hot house, the fuming acid,



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1 was turned into SO3 gas.

2 Q. Okay. So if there's SO3 gas coming out of the
3 HIP the CIP, the converter, the superheater, the
4 ductwork or the --

5 A. It would be mixed with SO2 gas.

6 Q. And if that's happening, nobody at DuPont has
7 told you that it's SO3?

8 A. No.

9 Q. They haven't?

10 A. As far as I know, it's SO2 gas.

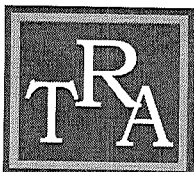
11 Q. They haven't told you that it's SO3; right?

12 A. Well, I have talked to Percy Bell in the past and
13 stuff like this. I can remember us sitting down and
14 having a class on this, but they said, "That's SO2."
15 "This is SO2." "That's is SO3." "This is SO2 gas."
16 And in different places I worked at, that's how you
17 learned. I kept that knowledge within myself to learn
18 that myself is how I know it's SO2 gas, but either one,
19 you've got to protect myself from it no mater what.

20 Q. That training you were just talking about, that
21 was in how the plant is supposed to operate when it's
22 not leaking; right?

23 A. Correct.

24 Q. Okay. So nobody's sat down with you in
25 connection with these leaks and said, "You've got SO2



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1 coming out here and SO3 coming out there," you haven't
2 had anybody tell you specifically where --

3 A. This would be the HAZWOPER training that we had,
4 it would have to be where we can't control it. That's
5 where the HAZWOPER training that we had comes in effect.
6 Besides that, we got to work in it to keep it from going
7 off site or whatever, keep it from coming out the
8 converter as far as that goes.

9 Q. Okay. And I just want to be clear, nobody's come
10 out and said, "Okay. Over here, this leak is emitting
11 SO2, and over here, this is emitting SO3"? Nobody's
12 really sat down and told you that; right?

13 A. No.

14 Q. Okay.

15 MS. BARNEY:

16 All right. I think that's all I have.

17 THE WITNESS:

18 Okay.

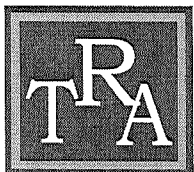
19 MS. BARNEY:

20 Thank you, Mr. Blanchard.

21 THE WITNESS:

22 You're welcome.

23 (Testimony concludes at 4:03 p.m.)
24
25



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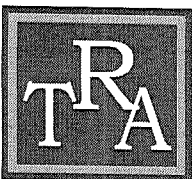
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2 REPORTER'S CERTIFICATE:
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4 I, ELICIA H. WOODWORTH, Certified Court
5 Reporter in and for the State of Louisiana, as the
6 officer before whom this testimony was taken, do hereby
7 certify that Lonnie Blanchard, after having been duly
8 sworn by me upon authority of R.S. 37:2554, did testify
9 as hereinbefore set forth in the foregoing 135 pages;

10 That this testimony was reported by me in
11 the stenotype reporting method, was prepared and
12 transcribed by me or under my personal direction and
13 supervision, and is a true and correct transcript to the
14 best of my ability and understanding;

15 That the transcript has been prepared in
16 compliance with transcript format required by statute or
17 by rules of the board, that I have acted in compliance
18 with the prohibition on contractual relationships, as
19 defined by Louisiana Code of Civil Procedure Article
20 1434 and in rules and advisory opinions of the board;

21 That I am not related to counsel or to the
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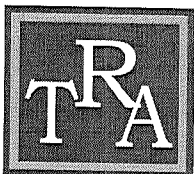
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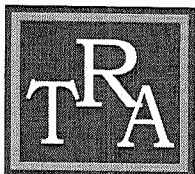
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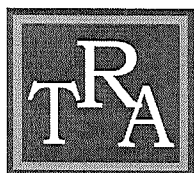
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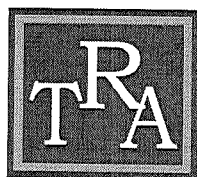
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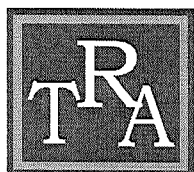
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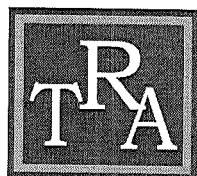
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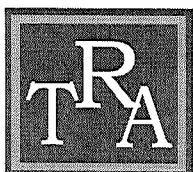
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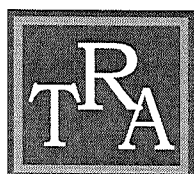
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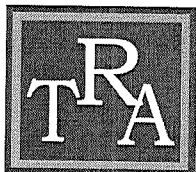
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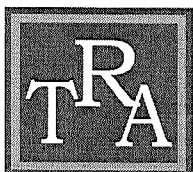
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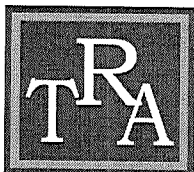
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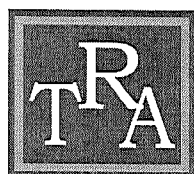
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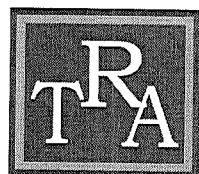
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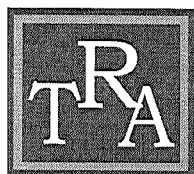
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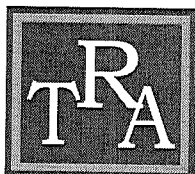
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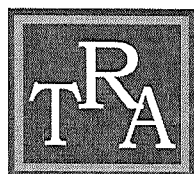
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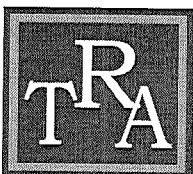
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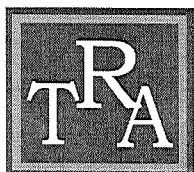
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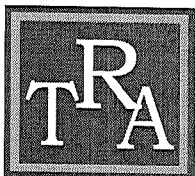
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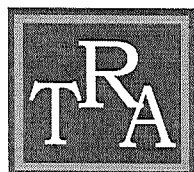
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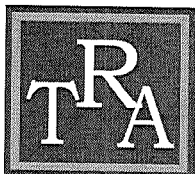
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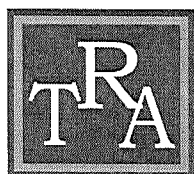
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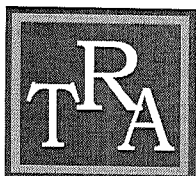
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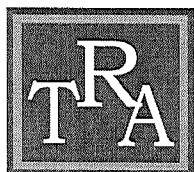
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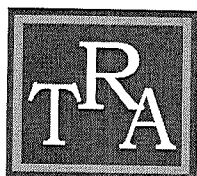
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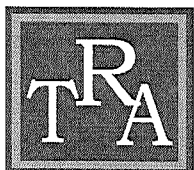
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PONT CONTRACTOR

Job Safety Analysis/Safety Task Assignment

Instructions:

- The purpose of this document is to identify and eliminate HAZARDS.
- To be completed by contractor lead person or supervisor with employee participation prior to beginning work.
- If conditions change during the course of the job, STOP! And re-evaluate the task with SUPERVISION before proceeding.
- Follow all plant and area safety rules as well as those listed in your green book.

General Information

Contractor: KBR
 Supv./Lead Person: Thomas Blanchard
 Date: 08-01-12 Time: 0700
 Job/Task Description: Repair gas leak
 Bldg./Unit/Area: Converter

Emergency Action Plan

Evacuation route/Assembly post Dugout
 Alternate route/Post KBR
 Nearest Alarm Box _____
 Unit Fire Alarm Numbers _____
 Unit Fume Release Number _____
 Nearest PA/Intercom Water Plant
 Nearest Safety Shower/Eyewash Station Water Plant
 Weather Conditions Hot
 Wind Direction North
 Emergency Phone # Intercom

★ Job Scope Change ★

Corrective Action _____

★ ☐ Update JSA ★ ☐ New JSA

EXHIBIT # 1

DEPONENT L. Blanchard



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Permits and/or Notification Required:

- | | |
|---|---|
| <input type="checkbox"/> Work Permit | <input type="checkbox"/> Line Break Permit |
| <input checked="" type="checkbox"/> Flame/Spark/Hot Work Permit | <input type="checkbox"/> Rescue Plan |
| <input type="checkbox"/> Vessel/Confined Space | <input type="checkbox"/> S43G Checklist |
| <input type="checkbox"/> Applicable MSDS | <input type="checkbox"/> Excavation Checklist |
| <input type="checkbox"/> Excavation Permit | <input type="checkbox"/> Excavation |
| <input type="checkbox"/> Knife Procedure | <input type="checkbox"/> Welding Procedure |
| <input type="checkbox"/> Hot Tap | <input type="checkbox"/> Electrical Close Proximity for Equipment |
| <input type="checkbox"/> Electrical Close Proximity for Personnel | <input type="checkbox"/> Crane/Suspended Work Platform |
| <input type="checkbox"/> Critical Lift Plan | <input type="checkbox"/> Mobile Equipment Permit for Work Near Hazardous/Critical Pipelines |
| <input type="checkbox"/> Specific Written Job Plan | <input type="checkbox"/> Fall Protection Plan |
| <input type="checkbox"/> Other Permits | |

Are all pertinent permits/notifications in place?

☒ Yes ☐ No

Hand Safety Analysis

Hands/Fingers Exposed to:

- ☒ Cuts by sharp edges/cutting implements
- ☒ Abrasions caused by friction/moving parts
- ☒ Burns caused by extreme heat/cold
- ☐ Contusion caused by falling objects
- ☐ Crushing by sharp edges/cutting implements
- ☒ Irritation from chemicals/flammables
- ☐ Punctures from sharp pointed objects
- ☒ Electrical Shock
- ☒ Overexertion/Repetitive Work

Do you have the correct tool for the job?

- ☒ Is it in safe condition?
- ☒ Is it inspected?

Have you inspected materials for:

- ☒ Slippery Surfaces
- ☒ Rough Surfaces
- ☐ Jagged Edges
- ☐ Burns
- ☐ Slivers
- ☒ Pinch Points

Is Equipment properly locked out?

- ☐ Machines/Tools Guards in Place?
- ☐ Wearing Jewelry/Loose Clothing that could be caught in moving parts?
- ☒ Tool Kick Back

Type of Hand Protection Required?

Leather/Kevlar@/Chemical/etc. (Be Specific)

Leather/Kevlar

Other: _____

Form Created 4/22/10

Is the proper equipment/tool being used for the job and has it been inspected?

☒ Yes ☐ No (If No - Action Required)

Are operators qualified on the type of tool or equipment being used?

☒ Yes ☐ No (If No - Action Required)

Do all personnel have required training?

☒ Yes ☐ No (If No - Action Required)

Standby Equipment

- | | |
|---|---|
| <input type="checkbox"/> O ₂ /LEL Meter | <input type="checkbox"/> 5 Minute Air Packs |
| <input type="checkbox"/> 30 Minute SCBA | <input type="checkbox"/> Life Line for Rescue |
| <input type="checkbox"/> Air Horn | <input type="checkbox"/> Two-Way Radio |
| <input checked="" type="checkbox"/> Fire Extinguisher | |
| Type _____ | |
| Class _____ | |
| <input type="checkbox"/> Fire Watch | |
| <input type="checkbox"/> Other _____ | |

Reference Section

- ☒ Hearing Protection Plugs
- ☐ Monogoggles Worn
- ☐ Breathing Air
- ☐ Respirator Type/Cartridge
- ☐ Full Body Protection
- ☒ 100% Fall Protection harness
- ☐ Face Shield
- ☐ Electrical Arc Protection
- ☒ Leg/Foot Protection Steel Toe
- ☒ Other PPE Safety Glasses
- ☒ Scaffold Required ☐ Standard (10 Ft. Span)
- ☒ Medium (8-6 Ft. Span) ☐ Heavy (4 Ft. Span)
- ☒ Barricade Area-Rigid/Warning
- ☒ Post Warning Signs
- ☒ Housekeeping
- ☒ Mobile Equipment Man Lift
- ☐ Power Tools
- ☐ GFCI Required (test before each use)
- Other Precautions _____

KBR000013

HAZ S/PREVENTIVE MEASURES/PPE

List all hazards that apply:

Chemical Hazards

Preventive Measure Be aware of hot pipes

PPE Required Rubber Gloves if needed

Confined Space

Preventive Measure

PPE Required

Congested Area

Preventive Measure

PPE Required

Electrical

Preventive Measure

PPE Required

Elevated Work

Preventive Measure Baseboard. AFTA

PPE Required

Environmental

Preventive Measure

PPE Required

Heat/Cold

Preventive Measure Take Break Drink Plenty

PPE Required

High Noise

Preventive Measure Wear Hearing protection

PPE Required

Hot Pipe/Equipment

Preventive Measure Take Extreme Caution

PPE Required

Lifting

Preventive Measure

PPE Required

Line of Fire

Preventive Measure Be aware of Back

PPE Required

Wear PPE

Lock Out/Tag Out

System Lockout

Lock out box #/Location #25 North of CC

PPE Required Lock + Tag

Manual Material Handling

Preventive Measure

PPE Required

Mechanical Material Handling

Preventive Measure

PPE Required

Pinch Points

Preventive Measure Watch finger placement

PPE Required

Poor Lighting

Preventive Measure

PPE Required

Respiratory Hazards (Dust/Fume/Vapor)

Preventive Measure

PPE Required

Scaffold

Inspected

Preventive Measure Make sure scaffold is

PPE Required

Sharp Objects

Preventive Measure Watch finger placement

PPE Required

Slip/Trip

Preventive Measure Watch finger placement

PPE Required

Trapped Liquid

Preventive Measure

PPE Required

Other (Be Specific)

Wear Wasp nest

I HAVE READ AND UNDERSTAND THE ABOVE INFORMATION AND HAVE RECEIVED VERBAL INSTRUCTION FROM MY SUPERVISOR/LEAD PERSON. I HAVE ALSO READ AND UNDERSTOOD ALL THE NECESSARY PERMITS REQUIRED FOR THIS TASK. (SIGN BELOW)

Print Name

Signature

Robert Carlette

Robert Carlette

Blaine Bourgeois

Ray Clements

Ray Clements

Ray Clements

Post Job Requirements:

- ☐ Locks Removed
- ☐ Work Area Clean
- ☐ Tools/Materials/Equipment Stored Properly
- ☐ Trash/Scrap/Waste in Correct Containers
- ☐ Other

- ☐ Did an incident or near miss occur?
- ☐ If yes, explain

- ☐ Was it reported to safety?
- ☐ Was it reported to the Unit/Area?

Supervisor/Lead Person Signature

KBR000014

Job Hazard Analysis

JOB HAZARD ANALYSIS (JHA) IS AN IMPORTANT ACCIDENT PREVENTION TOOL THAT WORKS BY FINDING HAZARDS AND ELIMINATING OR MINIMIZING THEM BEFORE THE JOB IS PERFORMED AND BEFORE THEY HAVE A CHANCE TO BECOME ACCIDENTS. USE YOUR JSA FOR JOB CLARIFICATION & HAZARD AWARENESS

[illegible]

full barrier
respiratory
protection